

Re: Lucas County
Hazardous Waste
Borden Chemical Printing Ink
HWFAB #03-48-0146
G-TSDF

Mr. Thomas W. Shadle Operations Manager Borden Chemical Printing Ink 6725 Gilead Street Whitehouse, OH 43571

August 13, 1984

Dear Mr. Shadle:

On July 13, 1984, I inspected your facility for compliance with state and federal hazardous waste regulations. You represented the company. At that time you were in compliance.

As we discussed, you will hear more official word on the withdrawal of your permit. In the meantime, you should still plan to get rid of any waste over the Small Quantity Limitation (1000 kg) within 90 days.

Please do not hesitate to call if you have any questions.

Sincerely,

David L. Ferguson

Division of Solid and Hazardous

Waste Management

DLF/kb

Enclosure

cc: Paula Cotter, DSHWM, CO

# RCRA INTERIM STATUS INSPECTION FORM

Mark State: ಬ ယ Facility: Borden Chemical Printing Address: 0ne G-TSDF 다 G-T-TSDF T-TSDF Generator only (G) TSDF only Transporter (T) GENERAL INFORMATION (Name) Zip Code: Z If the site is a TSDF, check the boxes indicating which regulations are applicable. General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure Containers SOl Incineration/Thermal Treatment Surface Impoundments S04/T02 Tanks S02/T01 4357/ County: 400005 INSPECTION PARTICIPANTS(S) INSTALLATION ACTIVITY Operations NSPECTOR(S) 6725 Sol + Has west /61 (Title) Gilead U.S. Telephone: EPA 414-877-5352 Ĭ.D. Waste Piles S03 Post-Closure Groundwater Monitoring Chemical/Physical/ Biological TO4 Land Treatment D81 Landfills D80 416-877-5392 City: While house # OHD DOS 043 HWFAB # 03-18-0196 (Telephone

Rешагк #

NO N/A

Has the facility submitted a Part A to Ohio?

2. If "yes", is it complete and accurate?

Has the facility submitted a Part B?

REMARKS, PART 1. GENERAL INFORMATION Include a brief description of site activity and waste handling. a formality, a 750 mespectum was done

letter of the F-30-83 inspection. Manely the broken int The secons for the Facility sains able to oberate as a Gon probably SQC are explained in the cover waste o no longer alessed as H.W.

# PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### :: α General Facility Standards Preparedness and Prevention ŭ ö Contingency and Emergency Manifest/Records/Reporting SUBPARTS INCLUDED $\pm 5$ Closure Financial Requirements

The facility has -

A 24-hour surveillance system, or

IF BOTH 3a AND 3b ARE "YES", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

An artificial or natural barrier and a means to control entry at all times (265.14(b)(2).

- entrance to the active portion of the facility and at other locations as necessary. (265.14(c))The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each 5
- a) The operator must develop and follow a comprehensive, written inspection plan and must document the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) ģ
- b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)
- The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course.
- The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. ထ
- If required due to the actual hazards associated with Ignitable, Reactive or the facility meets the following requirements incompatible waste materials, (Section 265.17). 9
- a) Protection from sources of ignition.
- b) Physical separation of incompatible waste materials.
- "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled. G
- Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). ਚ

Preparedness and Prevention

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this	Has
this facility? (265.31)	there been
	מי
(265.31	fire,
	explosion
	9
	Has there been a fire, explosion or non-planned release of hazardous waste at
	release
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	hazardous
	waste
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- facility has the following equipment: If required due to actual hazards associated with the waste material, the (265.32)
- a) Internal alarm system.
- Access to telephone, radio or other device for summoning emergency assistance.
- c) Portable fire control equipment.
- Water at adequate volume and pressure via hoses sprinkler, foamers or
- All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33)
- sonnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) If required due to the actual hazards associated with the waste material,
- adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) If required due to the actual hazards associated with the waste material
- emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)the facility has attempted to make appropriate arrangements with local If required due to the actual hazards associated with the waste material,
- Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)  $\,$

-		1	K		K	1	71	17		Yes
									17	8
*	<b>\</b>									N/A
										Remark #

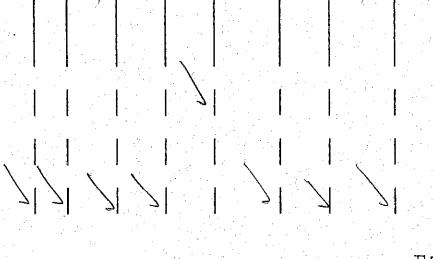
## 위

Yes

### Contingency and Emergency Subpart D:

- from The facility has a written Contingency Plan designed to minimize hazards fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
- Actions to be taken by personnel in the event of an emergency incident. æ
- Arrangements or agreements with local or state emergency authorities. 9
- Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.  $\hat{c}$
- A list of all emergency equipment including location, physical description and outline of capabilities. Ŧ
- If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f))(e)
- A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) might be required to participate in the execution of the plan.
- The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) or failure of the plan. က
- familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) An emergency coordinator is designated at all times (on-site or on-call) is
- If an emergency situation has occurred, the emergency coordinator has implemented of the actions and made al of the notifications deemed necessary under Sections 265.56. all or part of the Contingency Plan and has taken all

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# Subpart E: Manifests/Records/Reporting

	NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SI
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	SITE TREATMENT, STORAGE AND DISPOSAL
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disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal. (262.73(b)(1)  b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).  c) The estimated (or actual) weight, volume or density of the waste material(s).  d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).  e) The present physical location of each hazardous waste within the facility.  f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste manifest document number(s). (265.73(b)(2)  g) Records of the inspections required under Section 265.15 (General Inspection Requirements - Subpart B).  1) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6).  1) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart 6.	
1-17/17/17/17/17/17/17/17/17/17/17/17/17/1	1

The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES

- Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71)
- If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b))(B)
- Any significant discrepancies in the manifest, as defined in Section 265.72(a) are noted in writing on the manifest document. (265.71(a)(2) a
- by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. manifest discrepancies have been reconciled within 15 days as required Any
- disposal an unmanifested waste report containing all the information required sources (except from small quantity generators) for treatment, storage, or If the facility has accepted any unmanifested hazardous wastes from off-site by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. റ

## Subpart G: Closure and Post-Closure

NOTE: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES

- file at the facility and contains the following A written Closure Plan is on elements: (Section 265.112) elements:
- (265.112(a)(1) A description of how and when the facility will be closed.

L Set H

Revis, /15/82

## RCRA INTERIM STATUS INSPECTION FORM

N/A Remark #

NOTE: COMPLIANCE WITH THESE REGULATIONS IS A FEDERAL REQUIREMENT.

A combination of financial mechanisms.

A closure letter of credit, or

A surety bond, or

es No N/A Remark#

A written cost estimate for closure of the facility (as specified in the closure plan) is available.

# REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

Pernant It 2. C. Mohael Smith, P.E. of Hand + Smith consiltants closed" the facility on 9-13-83, However, west Remark # 1. Sub Part E. The Pacelly is acting as a zerotator and has no specific operating Record. The marifests be generated in small gear toke serve the same purpose

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6.	, Ui	4	ω	, N				<u></u> ;			<u> </u>	₩.	
Containers holding hazardous wastes are never stored near which may interact with the waste in a hazardous manner.	Containers holding Ignitable or (15 meters) from the property lisuch wastes in Section 265.17 (pmet (265.176).	The area where containers are st corrosion at least weekly and su	Hazardous waste containers are not stored, handled or which may rupture the container or cause it to leak.	Containers are stored closed exc wastes. (265.173(a))	c) Compatible with the wastes stored in them (265.172)	b) In good physical condition (265.171)	a) Closed (265.173)	Hazardous wastes are stored in containers which are:			Management of Tanks Surface Impoundments	Management of Containers	
tes are never stored near other materials in a hazardous manner. (265.177(c)	Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176).	The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174)	opened in a ma (265.173(b))	Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a))	tored in them (265.172)	265.171)		ontainers which are:		Subpart I: Management of Containers	ent		SUBPARIS INCLUDED
	feet ing								Yes No N/A Remark #		Thermal Treatment Chemical/Physical/Biological Treatmen	Incinerators	

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Munnich + Smith

October 25, 1983

Borden Inc. Environmental Affairs 165 N. Washington Avenue Columbus, OH 43215

Attn: Mr. Thomas R. Heaton

NOV 0 : 138.

ENV. CONMETTAL AFFAIRS

ROUTE TO: WBB \_ LJ \_

TH \_ SRW \_

CIVS \_ \_\_\_\_

Re: Closure Plan

Borden Chemical Whitehouse, Ohio

### Gentlemen:

Pursuant to your request, our office has reviewed the Closure and Post-Closure Plan for your Printing Ink Division facility located at 6525 Gilead Street, Whitehouse, Ohio. More specifically, our review was orientated to your September 9, 1982 request to USEPA Region V for withdrawal of your RCRA permit for the storage of hazardous waste material at this facility. The undersigned, on September 13, 1983 visited the site and was given a tour of the facility by Mr. Thomas W. Shadle, Plant Manager. At that time, there was no evidence that any hazardous waste was currently being stored on site, nor any evidence that a spill of any nature had occurred previously. It appeared that the area designated for the storage of hazardous waste material had been thoroughly cleaned and all drums and storage containers properly removed from the site.

It is our understanding that the facility is continuing to generate hazardous waste and that storage of this waste in the future will be for a period of less than 90 days.

Based on the above, I hereby certify that the drum storage area has been closed in accordance with the facility's approved closure plan.

Very truly yours,

C. Michael Smith, P.E.

hm B70Al

cc: Mr. Thomas W. Shadle file (2)

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### \_ardous • waste • facility • approval • board

Richard F. Celeste, Governor Robert H. Maynard, Chairman



P.O. Box 1049 361 E. Broad St. Columbus, Ohio 43216 (614) 462-6981

November 21, 1983

RECEIVED OHIO EPA

NOV 22 1983

DIV. HAZARDOUS MATERIALS MANAGEMENT

Thomas R. Heaton Borden Chemical, Printing Ink Div. 165 N. Washington Avenue Columbus, Ohio 43215

Dear Mr. Thomas R. Heaton:

This correspondence acknowledges our receipt of the Board certified copy of the hazardous waste permit originally issued to your facility.

The permit (#03-48-0416) is considered to be withdrawn at your request and therefore is no longer valid.

If you have any questions concerning your permit, please do not hesitate to contact me.

Sincerely,

Philbin L. Scott Technical Advisor

PLS/dmc

cc: Tom Crepeau, Ohio EPA DHMM

Facility File

File Border Van West Lucas

### hazardous • waste • facility • approval • board

Richard F. Celeste, Governor Robert H. Maynard, Chairman

### RECEIVED OHIO EPA

NOV 25 1983

DIV. HAZARDOUS MATERIALS MANAGEMENT

Thomas R. Heaton Borden Chemical, Printing Ink Div. 165 N. Washington Avenue Columbus, Ohio 43215 hwfac

P.O. Box 1049 361 E. Broad St. Columbus, Ohio 43216 (614) 462-6981

November 23, 1983

Dear Mr. Thomas R. Heaton:

Please disregard our letter of November 21, 1983, as an erroneous permit number was used on that correspondence. This correspondence officially acknowledges our receipt of the Board certified copy of the hazardous waste permit originally issued to your facility.

The permit (#03-48-0146) is considered to be withdrawn at your request and therefore is no longer valid.

If you have any questions concerning your permit, please do not hesitate to contact me. I again apologize for the mistake.

Sincerely,

Philbin L. Scott Technical Advisor

PLS/dmc

cc: Tom Crepeau, Ohio EPA DHMM Facility File NW

SEP 2 8 1984

RECLIVED OFIO EPA

OCT 23 1984

5HM-13

R.J. Ventres, Executive Vice President Borden Chemical Company-Printing Ink Division 180 East Broad Street Columbus, Ohio 43215

DIV. of SOLID & HAZ. WASTE MGT

RE: Withdrawal of Part A
FACILITY NAME: Borden Chemical CompanyPrinting Ink Division

U.S. EPA ID #: OND 005-043-740

Dear Hr. Ventres:

This Agency has been advised by the Ohio Environmental Protection Agency (Ohio EPA) that the referenced facility is no longer operating as a storage facility under Federal rules. The facility's current status under the Resource Conservation and Recovery Act (RCMA) is that of a generator storing less than 90 days. This letter acknowledges your change in status.

Should you decide in the future to initiate storage of hazardous wastes for greater than 90 days, and such storage is consistent with the original Part A application, you must resubmit a Part A application within 30 days of such initiation.

Should you purpose to initiate storage of hazardous wastes in a manner inconsistent with the original Part A application, or to initiate the treatment or disposal of hazardous wastes, you must contact our office and the Ohio EPA at least ten days prior to such initiation. Based on the specifics of the proposed changes, we will advise you whether actual issuance of a permit is a prerequisite for such changes, or whether submittal of Part A and B of your application is sufficient. Failure to resubmit a Part A application, or to contact our office as mentioned above, would subject you to enforcement action. RCRA provides for civil penalties up to \$25,000 per violation.

If you have questions, please contact Rebecca Strom of my staff, at (312) 886-6194, for assistance.

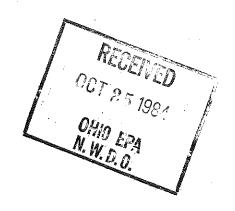
Sincerely yours,

Karl J. Klepitsch, Jr., Chief Waste Management Branch

cc: Tom Carlisle, Ohio EPA

Environmental Engineer

Thomas H. Shadle, Operations Hanager





Re: Lucas County

Hazardous Materials

Borden Chemical Printing Ink

HWFAB #03-48-0146

Mr. Thomas W. Shadle Operations Manager Borden Chemical Printing Ink 6725 Glead Street Whitehouse, OH 43571

September 28, 1983

Dear Mr. Shadle:

On August 30, 1983, I conducted an inspection of your facility for compliance with State of Ohio Hazardous Waste Regulations. As a formality, a Generator inspection was conducted pending final determination of your ink wash. No violations were found at that time. A copy of the inspection form is enclosed for your records. As I mentioned during the time of the inspection, Federal regulation numbers are used for reference only.

I questioned your IOC from F. Rosenbloom stating that your KO86 ink wash is non-hazardous since KO86 is a listed hazardous waste and normally requires a formal delisting from the U.S. EPA in Washington, D.C. I discussed this with Ken Humphrey, Technical Assistance, Central Office. Our determination is that the waste is non-hazardous only if it never had chrome or lead in it.

If this is the case, your facility will remain a Small Quantity Generator. If not, you must continue to maintain Generator status. There appears to be no problem for you to ship your waste within 90 days.

If you have any questions, please call me at 352-8461.

Sincerely,

David L. Ferguson

Division of Hazardous Materials Management

DLF/kb

Enclosure

cc: Paula Cotter, DHMM, CO



## RCRA INTERIM STATUS INSPECTION FORM

Facility: Borden Chemical Printing Ink Address: 6735 Orlead St. 7in Code: 4357/ County: 26065 Telephone: 416-877-5392 EPA I.D. # 0H/O ONS 043740 city: Whisehouse

			Generator only (G)	Mark One	<b>ω</b> , 1	1. Have Ferzusen	2.	1. Thomas W. Shadle		///
Incineration/Thermal Treatment	<pre>7 Tanks S02/T01 7 Surface Impoundments S04/T02</pre>	7 Containers SOI	General Facility Standards, Preparedness and Prevention, Contingency and Emergency, Manifests/Records/Reporting, Closure	INSTALLATION ACTIVITY  If the site is a TSDF, check the boxes indicating wh		INSPECTOR(S)  ON. of No. 2. Mar. Mys.		Operations Manager	INSPECTION PARTICIPANTS(S)	
<pre> Groundwater Monitoring Post-Closure</pre>	Chemical/Physical/ Biological TO4	∠ Landfills D80	<pre>// Waste Piles S03 // Land Treatment D81</pre>	indicating which regulations are applicable.		419-35-2-8461		(Telephone) 4/9-877-5382		100000

Remark #

N/A

Yes No

- Has the facility submitted a Part A to Ohio?
- If "yes", is it complete and accurate?
- 3. Has the facility submitted a Part B?

Include a brief description of site activity and waste handling.

This Paulin will now be closefued a 506

It no longer uses Cr or Cd in its preparents oskylore un

A generator inspection was done to finalize and veryly had a permet for 1086, Occassional S. a. solvents.

permit withdrawd, 90 days is no problem. No whish in site.

See Cover Detter for further explanation

## Subpart C: Preparedness and Prevention

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N/A

Remark #

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this facility? (265.31)	. Has there been a fire, explosion or non-planned release of hazardous waste at
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- If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32)
- Internal alarm system
- Access to telephone, radio or other device for summoning emergency assistance.
- Portable fire control equipment.
- d) Water at adequate volume and pressure via hoses sprinkler, foamers or sprayers
- ယ All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) as necessary; testing and maintenance are documented.
- sonnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) If required due to the actual hazards associated with the waste material, per-
- نان ژ control equipment is maintained. adequate aisle space to allow unobstructed movement or emergency or spill If required due to the actual hazards associated with the waste material, (265.35)
- တ and the facility layout. emergency service authorities to familiarize them with the possible hazards the facility has attempted to make appropriate arrangements with local If required due to the actual hazards associated with the waste material (265.37(a)
- into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)  $\,$ Where state or local emergency service authorities have declined to enter

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Remark

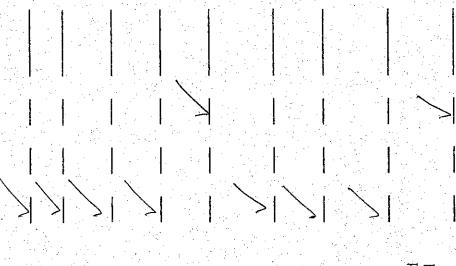
N/A

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Yes

# Subpart D: Contingency and Emergency

- from The facility has a written Contingency Plan designed to minimize hazards fires, explosions or unplanned releases of hazardous wastes (265.51) and contains the following components:
- in the event of an emergency incident. Actions to be taken by personnel
- Arrangements or agreements with local or state emergency authorities.
- Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator.  $\hat{\sigma}$
- A list of all emergency equipment including location, physical description and outline of capabilities. Ŧ
- If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) (e)
- A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) ς.
- The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54)
- familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) An emergency coordinator is designated at all times (on-site or on-call) is
- If an emergency situation has occurred, the emergency coordinator has implemented of the actions and made all of the notifications deemed necessary under Sections 265.56. all or part of the Contingency Plan and has taken all ъ,



## GENERATOR REQUIREMENTS

		e
compliance with the requirements of Sections 262.11.	acknowledged to be hazardous waste(s) as defined in Section 261 and in	<ol> <li>The hazardous waste(s) generated at this facility have been tested or are</li> </ol>
+ 5- 2		์ต์

'n regulation under Section 261.4 (statutory exclusions) or Section 261.6 Does this facility generate any hazardous wastes that are excluded from (recycle/reuse)?

ω from regulation because of totally enclosed treatment (Section 265.1(c)(9)) or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10)). Does this facility have waste or waste treatment equipment that is excluded

use and retention of the hazardous waste manifest: The generator meets the following requirements with respect to the preparation,

262.21(a) and (b) and the minimum number of copies required by Section 262.22. The manifest form used contains all of the information required by Section

۵ and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20. The generator has designated at least one permitted disposal facility

**C**) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23.

<u>d</u> The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a), (b)

<u>e</u> Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40.

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Remark

N/A

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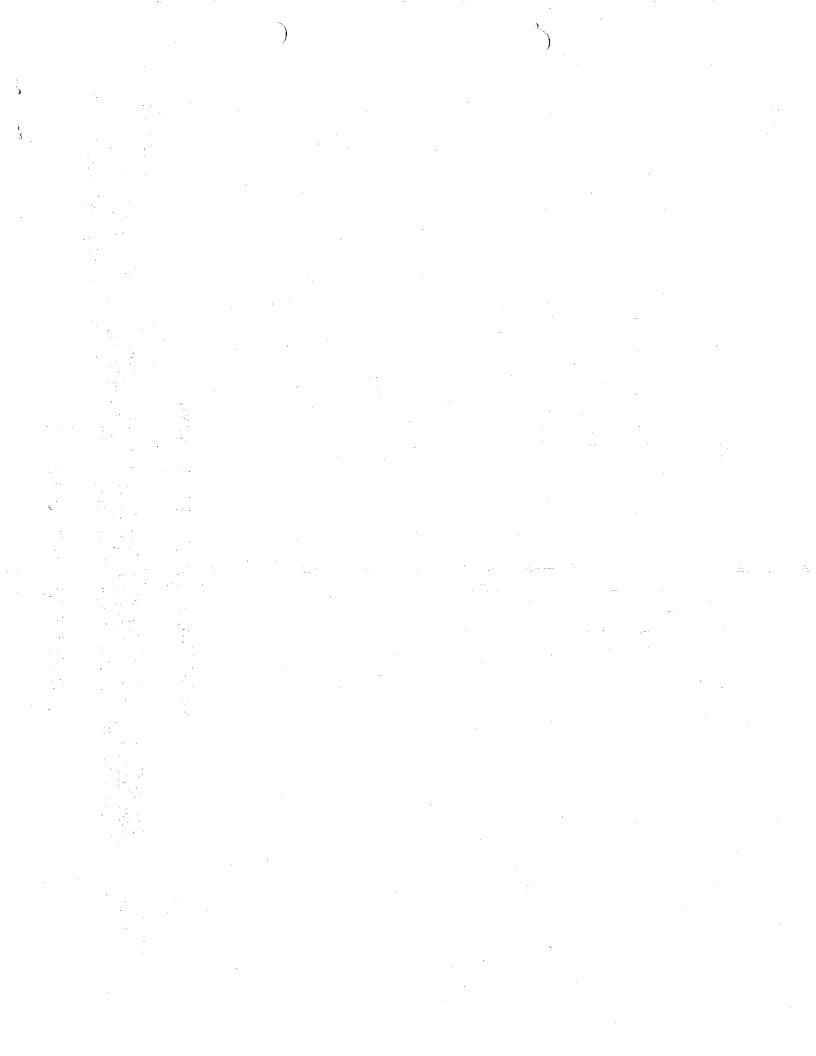
Yes

- - Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a))
- Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) or less is affixed with a completed hazardous waste label as required by Section 262.32(b). P
- The generator meets requirements for properly placarding or affering to properly placard the initial transporter of the waste material in compliance with Section 262.33. ်
- Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50. ģ
- Section 262.34, the following requirements with respect to such storage are met: If the generator elects to store hazardous waste on-site in <u>containers</u> or tanks for 90 days or less without a RCRA storage permit as provided under
- The containers are clearly marked with the words "Hazardous Waste". (p
- The date that accumulation began is clearly marked on each container. **P**
- The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation providing an annual training program refresher course (Section 262.34) and emergency response procedures, training new employees within 6 months φ.
- The generator keeps all of the records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records (Section 262.34). ġ,

NOTE :

SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265, SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE INSPECTION FORM.

REMARKS, PART 2. GENERATOR REQUIREMENTS





### INTER-COMPANY AND OFFICE CORRESPONDENCE

FEB

Graphics Division

DATE:

February 3, 1983

FROM:

F. Rosenbloom

ADDRESS:

DIV./DEPT.

Woodlawn

SUBJECT:

TO:

WASTE DISPOSAL

TOM SHADLE - WHITEHOUSE

TELEPHONE:

Ext. 6282

I reviewed the regulations and based upon the analysis of your waste material, your product mix and the now accepted U.S. EPA interpretation of K-086 (into wash waste) that we can consider your water waste non-hazardous.

By definition, then, we can call it an "ink waste" and we will not be required to manifest its disposal.

Please provide me with the name and address of the disposal site so that suitable checks can be made on the company you plan to use. Upon approval, you can then start shipping the waste at the reduced cost you've been able to negotiate.

F. Rosenbloom

FR:nd

cc: W. B. Barton

- T. Heaton
- P. Semadeni
- G. Sickinger
- G. Starkey
- J. Warren

Borden Borden

### General Oil Company

12680 Beech Daly Rd. - Detroit

Michigan 48239

535-2530

August 24, 1983

.Borden Chemical .6725 Gilead St. .Whitehouse, Ohio 43571 .ATTN: TOM SHADEL

RE: WASTE INK WASHWATER GOC Waste Code: 10031

Dear Mr. Shadel:

I am pleased to inform you that the waste material listed above has been approved for processing at General Oil Company, based on the Waste Stream Characterization submitted on August 13, 1983.

As you will note, a GOC Waste Code number has been assigned to this material. This number should appear in the comments section of the State of Michigan Waste Disposal Manifest accompanying all shipments.

If I can be of any further assistance, please don't hesitate to contact me.

Best Regards,

GENERAL OIL COMPANY, INC.

Michael Dawkins

MD:zfd

BOPDEN CHEMICAL DIVISION OF BORDEN INC.



March 21, 1983

Chem Met 18550 Allen Road P. O. Box 2169 Wyandotte, Michigan 48192

Attention: Mr. W. Hartman

Dear Mr. Hartman:

Cousins Waste Control will be delivering approximately 1000 gallon of waterbased ink wash which contains up to but not exceeding 10% by weight of perchloroethylene. This is not a normal component of our waste but was inadvertantly mixed in after it was used for some special cleaning of our equipment. This should be the only time that this will occur and I am advising you in advance since there are trace amounts in this particular shipment.

Sincerely,

THE BORDEN CHEMICAL COMPANY PRINTING INK DIVISION

Thomas W. Shadle, Operations Manager

TWS/cb

MDO

### hazardous • waste • facility • approval • board

James A. Rhodes, Governor Wayne S. Nichols, Chairman



P.O. Box 1049 361 E. Broad St. Columbus, Ohio 43216 (614) 462-6981

> RECEIVED OHIO EPA

> > SEP 14 1982

DIV. HAZARDOUS MATERIALS MANAGEMENT

T0:

√Tom Crepeau, Mgr. P & MRS/DHMM

FROM:

Bob Fragale, Technical Advisor

DATE:

September 14, 1982

**SUBJECT:** 

DHMM PROCESSING OF ATTACHED PERMIT MODIFICATION

REQUESTS

Attached please find the following existing facility permit modification requests requiring DHMM review, concurrence and/or recommendation:

MEMORAND<u>U</u>M

FACILITY	PERMIT NO.	`	TYPE
ITT Powersystems Division  Rorden Chemical-Printing Ink Div	03-13-#0387		MO GOND CONTRACTOR

Thank you for your attention to this matter. Should you have any questions or concerns, please feel free to contact me at your convenience.

BF/ss

Attachment

cc:

Paul Flanigan/DHMM Paula Cotter/DHMM

File

Bordon-Lucas

### CLOSURE COST ESTIMATE REVISED 12 JULY 82

RECEIVED

SUL 20 1982

ROUTE TO, WAS DEATER OF CRS SRW

Due to a product changeover at this location, closing costs are revised downward from our original estimate dated August 1981.

The current product line is a water-base system. All lead chromium and cadmium pigments have been eliminated from use. The waste system, by analysis, is not considered EP Toxic.

Closure will follow the original plan which includes properly cleaning all equipment including dust collectors, pumps, tanks, mills, and piping, etc. Any drum storage will be disposed of in an approved manner. Any spillage or penetration into the land surface will be removed and disposed of at an approved landfill. An independent registered professional engineer will be retained to certify correct closure has been accomplished.

The total revised closure cost estimate is \$20,000.

A letter of financial assurance will be available from our corporate offices.

Thomas W. Shadle, Manager

Borden Chemical Company Printing Ink Division Whitehouse, Ohio

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EPA I.D. NUMBER	/////	$\sqrt{ \cdot \cdot \cdot }$	it in the designated space. Reation carefully; if any of it	leview the form
II. FACILITY NAME			through it and enter the co	orrect o this
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FACILITY PLEASE PL	ACE LABEL IN	THÌS SPACE	that should appear), please proper fill—in area(s) below	provide it in the
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FACILITY			must be completed regardi	provided, Refer to
VI. LOCATION			the instructions for detail tions and for the legal au	led item descrip thorizations unde
			which this data is collected.	
II. POLLUTANT CHARACTERISTICS			on forms to the EPA. If you are	ver "ves" to any
INSTRUCTIONS: Complete A through J to determine questions, you must submit this form and the supplement	antal torm licted in the	i natentoesis tollowing tile Gi	TRZETOTE INDIV V IN THE NAVIH	FUP PILLS AGISTULI
if the supplemental form is attached. If you answer "no is excluded from permit requirements; see Section C of the	n" in asen nusition. Vi	au aeeu aus suomit anv ut ui	1828 1011112 1 00 11101 01121111 110	1, 1041 00417161
SPECIFIC QUESTIONS	MARK 'X'		QUESTIONS	MARK 'X'
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A. Is this facility a publicly owned treatment work which results in a discharge to waters of the U.S.	.7 x	include a concentrated aguatic animal product	I animal feeding operation or tion facility which results in a	x
(FORM 2A)  C. Is this a facility which currently results in discharge	15 17 18	discharge to waters of t  D. Is this a proposed facili	ity lother than those described	(9 20 2)
to waters of the U.S. other than those described A or B above? (FORM 2C)	in X 22 23 24	in A or B above) which waters of the U.S.? (FC	ch will result in a discharge to DRM 2D)	25 26 27
E. Does or will this facility treat, store, or dispose		I municipal effluent beli	ject at this facility industrial or ow the lowermost stratum con-	
hazardous wastes? (FORM 3)	x	taining within one o	quarter mile of the well bore, f drinking water? (FORM 4)	X 31 32 33
G. Do you or will you inject at this facility any product	ed 20 20 30	H Do you or will you in	iect at this facility fluids for spe-	
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oil or natural gas, or inject fluids for storage of liqu hydrocarbons? (FORM 4)	uid 34 34 34	(FORM 4)	recovery of geothermal energy?	37 31 39
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III. NAME OF FACILITY	earbean Alexander			
1 SKIP Borden Chemica	1 Print	ing Ink	<u> </u>	
IV. FACILITY CONTACT				
A, NAME & TITLE (las	t, first, & title)	<del></del>	B. PHONE (area code & no.)	
2 Shadle, TW Lab Pr	oductio	on Mgr.	4 1 9 8 7 7 5 3 9 3	
V. FACILITY MAILING ADDRESS		HARRY SERVICE	and the second of the second	
A. STREET OR S	P.O. BOX	<del></del>		
36,7,2,5, Gilead Stre	e t	45		
B. CITY OR TOWN	111111	C.STATE D. ZIP	CODE	
4Whitehouse		Q H 4.3.5	.7.1	(A)
VI. FACILITY LOCATION	<b>《图》文章中国</b>	联合的 经证券的	MANAGER AND	
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B. COUNTY NAME				
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C. CITY OR TOWN		D.STATE E. ZIP	CODE F. COUNTY CODE	
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ONTINUED FROM THE FRONT			
'II. SIE CODES'(4-digit, in order of priority)			
A. FIRST	<u> </u>	B, SECOND (specify)	
2,8,9,3   Printing Ink	7 , , , , , , , , , , , , , , , , , , ,	AND THE RESIDENCE OF THE PARTY	
C. THIRD	<u> </u>	D. FOURTH (specify)	
7	7		
VIII. OPERATOR INFORMATION	15 16 - 10		
A. NA	ME		B. Is the name listed in Item VIII-A also the owner?
Borden Inc	to see the second of the second of the second	Against the San	YES NO
C. STATUS OF OPERATOR (Enter the appropriate letter into			E (area code & no.)
F = FEDERAL M = PUBLIC (other than federal or state) S = STATE O = OTHER (specify) P = PRIVATE	p (specify)	A 6 1 4	2 2 5 4 0 0 0
E. STREET OR P.O. BOX	. <u> </u>		
1.8.0. E. B.r.o.a.d. S.t.r.e.e.t.			
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9 U 9		(specify) Misc. St	ate Permits
15 16 17 18 30 18 16 17 18 C. RCRA (Hazardous Wastes)	E. OTHER (specify)	An An Maria Cara and Maria and Anna and	
9 R	1 1 1 1 1 1	(specify)	<u> </u>
15 16 17 18 - 20 15 16 17 19		30	
XI, MAP			_
Attach to this application a topographic map of the area ex the outline of the facility, the location of each of its exist treatment, storage, or disposal facilities, and each well wh water bodies in the map area. See instructions for precise re	ting and proposed intake ere it injects fluids unde	and discharge structures, each	of its hazardous waste
XII. NATURE OF BUSINESS (provide a brief description)			
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XIII. CERTIFICATION (see instructions)			
I certify under penalty of law that I have personally examattachments and that, based on my inquiry of those personal application, I believe that the information is true, accurately false information, including the possibility of fine and imp	ersons immediately resp ate and complete. I am a	onsible for obtaining the inform	nation contained in the
A EA OFFICIAL TITLE (type or print) LY t W. Gutheil, President	B. SIGNATURE	<u> </u>	C. DATE SIGNED
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Borden Chemical	110000000	e Jacob Clark	
COMMENTS FOR OFFICIAL USE ONLY			
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HAZARDOUS WASTE PERMIT APPLICATION  (This information is required under Section 300s of ACRIA)  (TO OPTICIAL USE ONLY  PENSATOR EVISED APPLICATION  (This information is required under Section 300s of ACRIA)  (The properties box in A or B below fears one box andy) to indicate whether this in the first application of you superinted during the properties box in A or B below fears fears and the properties for the section of the properties of the properties for the prop	epse pr	int i	or t	ype • 502	in the unshaded ar wed for elite type,	eas on! <i>i.e., 12</i>	ly 2 <i>characters/i</i>	nch).										<b>Г</b> оп	n Apj	proved	I OM	B No.	158-5	800	04		
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III. PROCESSES CODES AND DESIGN CAPACITIES  A. PROCESS CODE — Enter the code from the list of process codes below that best describes as the process to be used at the facility. Ten lines are provided on entering codes. If more lines are needed, enter the codeful in the space provided. If a process will be used that is not included in the list of codes below, it describes the process line including its design capacity in the space provided. If a process will be used that is not included in the list of codes below, it describes the process.  1. AMOUNT — Enter the amount.  2. UNIT OF MEASURE — For each amount entered in column B(11), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.  PROCESS EXEMPTION OF CESS MEASURE FOR PROCESS CORE — ESPICING CAPACITY  FOR CORN TAINER (barrel, drum, etc.) \$01 CALLONS OR LITERS PROCESS CORE — ESPICING CAPACITY TOWN FOR THE COUNTY AND THE CO	5	¥8.	ED	0	3 OPER (use t)	ATIO	N BEGAN OF es to the left	RTHE	DA	TE	CONS	STRI	JCT	E (yr,	., mo. COM	, & d	day) NCED	73	74	73 76	77	78	yr, m FION EXPE	O, d	k day	OR OR	PER Is
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entering codes. If more lines are needed, enter the codefa in the space provided on the process included in the list of codes below, the describe the process including is design expectly in the space provided on the form (Item III-C).  B. PROCESS DESIGN CAPACITY — For each code entered in column A enser the capacity of the process.  J. AMOUNT — Enter the amount.  2. UNIT OF MEASURE — For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure that are listed below should be used.  PROCESS — APPROPRIATE UNITS OF CLESS —		-																							<b>37.4</b>		
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EPA Form 3510-3 (6-80) PAGE 1 OF 5 CONTINUE ON RE	FPA	<u>اد</u>	_	_				27	21			200		1.0		16	19									29 N F	EV

C	Section 1	from	# 1. a	front.
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III. PROCESSES (continued
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SPACE FOR ADDITIONAL PROCESS CODES OR FOR DESCRIBING OTHER PROCESSES (code "T04"). FOR EACH PROCESS ENTERED HERE

111	DECCDIBTION	ORITA	7 4 10 15 (5.11)	THE A COMPANY
ıγ.	DESCRIPTION	UFRA	LAKUUUS	WASIES

- A. EPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE	CODE
POUNDSP	KILOGRAMS	K
TONS	METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

### D. PROCESSES

1. PROCESS CODES:

For listed hazardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.

3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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X	-	0	0	2	400		P		T	0	3	D	8	0	)	T	1	1	1	1	
X-3	D	0	0	I	100		P		T	0	3	D	8	3 6	7			+	Т	-T-	
X-4	$\int_{\mathcal{L}}$	0	0	2							1		1	1	1	1	1		<u> </u>	1	included with above

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IV. DESCRIPTION OF HAZARDOUS WASTES (con	tinued)	
E. USE THIS SPACE TO LIST ADDITIONAL PROC	ESS CODES FROM ITEM D(I) ON PAGE 3.	
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13 14 13	·	
V. FACILITY DRAWING		
All existing facilities must include in the space provided on p	page 5 a scale drawing of the facility (see instructions	for more detail).
VI. PHOTOGRAPHS		
All existing facilities must include photographs (aeric	al or ground-level) that clearly delineate all ex	isting structures, existing storage
treatment and disposal areas, and sites of inture stor	age, treatment or disposal areas (see instruction	ns for more detail).
VII. FACILITY GEOGRAPHIC LOCATION	age, treatment or disposal areas (see instruction	ns for more detail).
treatment and disposal areas, and sites of inture stor	age, treatment or disposal areas (see instruction	ns for more detail).
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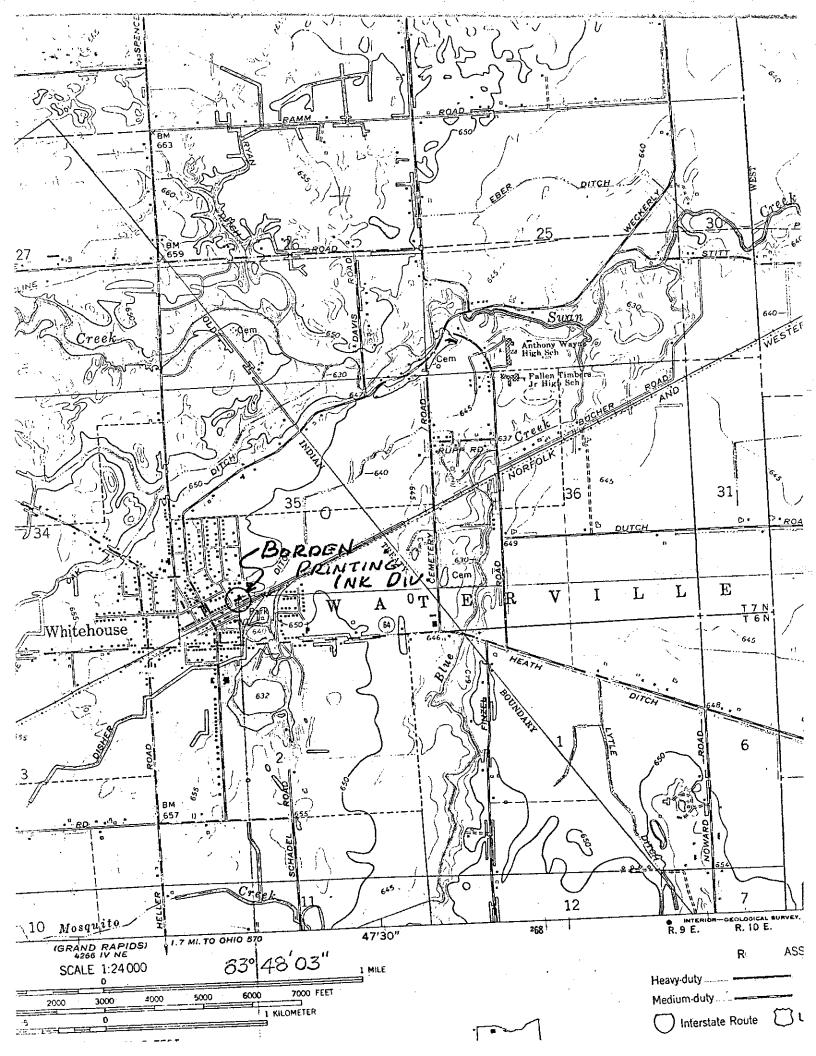
1000-meter Universal Transverse Mercator grid ticks, 2006 17, shown in blue Land lines south of Fulton Line based on the First Principal Meridian Land lines north of Fulton Line based on the Michigan Meridian Land lines north of sulton Line based on the Michigan Meridian Fine red dashed lines indicate selected fence and field lines where

generally visible on aerial photographs. This information is unchecked

WHITEHOUSE, OHIO SE/4 SWANTON 15' QUADRANGLE N4130-W8345/7.5

964

AMS 4267 III SE-SERIES V852



### CLOSURE AND POST-CLOSURE PLAN

FOR

### BORDEN CHEMICAL COMPANY

6725 GILEAD STREET, P. O. BOX 2758

WHITEHOUSE, OHIO 43571

### I. General Closure Considerations

- A. This facility consists of interdependent manufacturing processes; thus closure will occur as a unit.
- B. The facility will close upon some future closing date as yet undetermined. Closure will be completed within 90 days of generating the last volume of hazardous waste.
- C. The maximum quantity of waste in storage or treatment at any given time will not exceed process design capacities (specified on page 1, form 3, RCRA hazardous waste permit application).
- D. The facility equipment will be triple rinsed with an appropriate solvent. The residue will be properly disposed of as hazardous waste.

### II. General Post-Closure Activities

- A. Security will be maintained by fence around the facility with a monthly inspection of the area.
- B. The location, quantity and type of hazardous waste at the facility will be documented by the current RCRA permit application and record keeping of subsequent activity. Any movement of hazardous waste within or from the facility will be recorded.
- C. No food chain crop will be permitted on the RCRA facility, unless no impact can be determined.
- D. These activities will continue after closure with a time that the Regional Administrator determines is sufficient.

### III. Specific Closure and Post-Closure Activities for Facility

### A. Drums.

- 1. Full drums will be transported for proper disposal.
- Empty drums in which hazardous materials have been stored will be triple rinsed with an appropriate solvent.
- 3. Leaking drums of hazardous material will be enclosed in an over-pack drum for disposal.

B. All equipment including pumps, tanks, mills and piping will be triple rinsed with the residue being properly disposed of.

### IV. Cost Estimates

- A. Closure cost estimates \$60,000 (labor (material (transportation and disposal
- B. Post-closure costs \$25,000 (monitoring (transportation and disposal (contingency
- C. The cost estimates will be revised upon any change in the closure or post-closure plans.
- D. The cost estimates will be revised at least once annually using the current inflation factor.

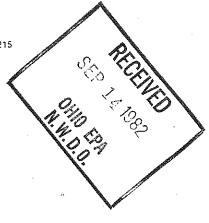
### V. Final Considerations

- A. These plans will be amdended upon a change in the operating plans.
- B. These plans will be submitted to the Retional Administrator 180 days prior to anticipated closure of the facility.
- C. An independent registered professional engineer will be contracted to certify that the facility has been closed in accordance with the approved closure plan.

**BORDEN INC** 

180 EAST BROAD STREET, COLUMBUS, OHIO 43215

September 9, 1982





THOMAS R. HEATON ENVIRONMENTAL SPECIALIST ENVIRONMENTAL AFFAIRS

USEPA Region V RCRA Activities P.O. Box A3587 Chicago, IL 60690-3587

Attn: Ms. Kathleen Homer

Re: Borden Chemical, Printing Ink Division Whitehouse, OH EPA ID#OHD005043740

Dear Ms. Homer:

For the referenced facility, Borden Inc. requests the withdrawal of its permit application (enclosed) for drum storage of hazardous waste. Production activity at this site will not cease, however Borden submits closure details for the drum storage area. The original permit application indicated hazardous waste storage in a tank (SO2), which was never used. Generator status will be maintained.

The complete closure plan is enclosed. The aspects of the closure plan which are pertinent to this correspondence are those relative to drum storage area closure. The drummed waste will be disposed of properly. Future storage of drums will not exceed ninety (90) days. No spills of hazardous waste have occurred, hence soil excavation and disposal is not necessary.

Other details of the closure plan include the disposal of decontamination wash waters, the disposal of dust collector residue, etc. Since the plant will continue to operate, these actions are superfluous.

Please respond in writing to acknowledge the change in status at this facility. If you have any questions, please call the undersigned at (614) 225-4860.

Sincerely,

Thomas K Healin

Thomas R. Heaton

TRH/slw

Enclosure

cc: Hazardous Waste Facility Approval Board
David L. Ferguson, Ohio EPA, Northwest District Office



Re: Lucas County

Hazardous Materials

Borden Chemical Printing Ink

HWFAB #03-48-146

September 2, 1982

Thomas W. Shadle Plant Manager 6725 Gilead Street Whitehouse, OH 43571

Dear Mr. Shadle:

On June 28, 1982, I conducted a RCRA Interim Status Standards inspection of your facility which was represented by you. The facility was found to be in compliance with all applicable State and Federal regulations.

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

A copy of the form completed during the inspection is enclosed. If you have any questions about the inspection, please call me at 352-8461.

Sincerely,

David L. Ferguson

Environmental Scientist

DLF/kb

Enclosure

cc: Kathy Homer, U.S. EPA, Region V w/encl.

cc: Paula Cotter, DHM, CO w/encl.



Re: Lucas County

Hazardous Materials

Borden Chemical Printing Ink

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David L. Ferguson

Environmental Scientist

DLF/kb

Enclosure

cc: Kathy Homer, U.S. EPA, Region V w/encl.

cc: Paula Cotter, DHM, CO w/encl.

MODIFICATION LOG SHEET

FACILITY NAME DATE RECEIVED TYPE DATE TO DHMM PUBLIC NOTICE DATE

SORDED Chemical 9-10-82 MO 9-14-82

PRINTING INK DIV.

RECEIVED OHIO EPA

SEP 14 1982

DIV. HAZARDOUS MATERIALS MANAGEMENT

REPORT RECEIVED DHMM RECOMMENDATION BOARD REVIEW DATE BOARD ACTION

COMMENTS

REQUEST to tERMINATE PERMIT

BORDEN INC RECEIVED
180 EAST BROAD STREET, COLUMBUS, OHIO 4321 STATE OF OHIO

September 9, 1982

1982 SEP 10 P 12: 06

HAZARDOUS WASTE FACILITY
APPROVAL BOARD



THOMAS R. HEATON ENVIRONMENTAL SPECIALIST ENVIRONMENTAL AFFAIRS

USEPA Region V RCRA Activities P.O. Box A3587 Chicago, IL 60690-3587

Attn: Ms. Kathleen Homer

Re: Borden Chemical, Printing Ink Division Whitehouse, OH EPA ID#OHD005043740

Dear Ms. Homer:

For the referenced facility, Borden Inc. requests the withdrawal of its permit application (enclosed) for drum storage of hazardous waste. Production activity at this site will not cease, however Borden submits closure details for the drum storage area. The original permit application indicated hazardous waste storage in a tank (SO2), which was never used. Generator status will be maintained.

The complete closure plan is enclosed. The aspects of the closure plan which are pertinent to this correspondence are those relative to drum storage area closure. The drummed waste will be disposed of properly. Future storage of drums will not exceed ninety (90) days. No spills of hazardous waste have occurred, hence soil excavation and disposal is not necessary.

Other details of the closure plan include the disposal of decontamination wash waters, the disposal of dust collector residue, etc. Since the plant will continue to operate, these actions are superfluous.

Please respond in writing to acknowledge the change in status at this facility. If you have any questions, please call the undersigned at (614) 225-4860.

Sincerely, Thomas RH

Thomas R. Heaton

TRH/slw

Enclosure

RECEIVED OHIO EPA

SEP 14 1982

DIV. HAZARDOUS MATERIALS MANAGEMENT

cc: Hazardous Waste Facility Approval Board
David L. Ferguson, Ohio EPA, Northwest District Office

		•

### CLOSURE COST ESTIMATE

REVISED 12. JULY 82

RECEIVED TO SUL SU ISOZ

STATE OF CHILD TO WAS AFFAIRS

TADDOUG WASTE FACILITY OF THE STATE OF T

HAZARDOUS WASTE FACILITY C APPROVAL BOARD

Due to a product changeover at this location, closing costs are revised downward from our original estimate dated August 1981.

The current product line is a water-base system. All lead chromium and cadmium pigments have been eliminated from use. The waste system, by analysis, is not considered EP Toxic.

Closure will follow the original plan which includes properly cleaning all equipment including dust collectors, pumps, tanks, mills, and piping, etc. Any drum storage will be disposed of in an approved manner. Any spillage or penetration into the land surface will be removed and disposed of at an approved landfill. An independent registered professional engineer will be retained to certify correct closure has been accomplished.

The total revised closure cost estimate is \$20,000.

A letter of financial assurance will be available from our corporate offices.

RECEIVED

SEP 14 1982

Thomas W. Shadle, Manager

DIV. HAZARDOUS MATERIALS MANAGEMENT

Borden Chemical Company Printing Ink Division Whitehouse, Ohio B. All equipment including pumps, tanks, mills and piping will be triple rinsed with the residue being properly disposed.

### IV. Cost Estimates

HAZARDOUS WASTE FACILITY APPROVAL BOARD

RECEIVED

A. Closure cost estimates - \$60,000 (labor

(material

(transportation and disposal

B. Post-closure costs

\$25,000 (monitoring (transportation and disposal (contingency

- C. The cost estimates will be revised upon any change in the closure or post-closure plans.
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### V. Final Considerations

- A. These plans will be amdended upon a change in the operating plans.
- B. These plans will be submitted to the Retional Administrator 180 days prior to anticipated closure of the facility.
- C. An independent registered professional engineer will be contracted to certify that the facility has been closed in accordance with the approved closure plan.

RECEIVED OHIO EPA

SEP 14 1982

DIV. HAZARDOUS MATERIALS MANAGEMENT RECEIVED OHIO EPA

FOR

RECEIVED STATE OF OHIO

BORDEN CHEMICAL COMPANY

1982 SEP 10 P 12: 06

SEP 14 1982

6725 GILEAD STREET, P. O. BOX 2758 APPROVAL BOARD

DIV. HAZARDOUS MATERIALS MANAGEMENT

WHITEHOUSE, OHIO 43571

### I. General Closure Considerations

- A. This facility consists of interdependent manufacturing processes; thus closure will occur as a unit.
- The facility will close upon some future closing date as yet undetermined. Closure will be completed within 90 days of generating the last volume of hazardous waste.
- The maximum quantity of waste in storage or treatment at any given time will not exceed process design capacities (specifie on page 1, form 3, RCRA hazardous waste permit application).
- D. The facility equipment will be triple rinsed with an appropriate solvent. The residue will be properly disposed of as hazardous waste.

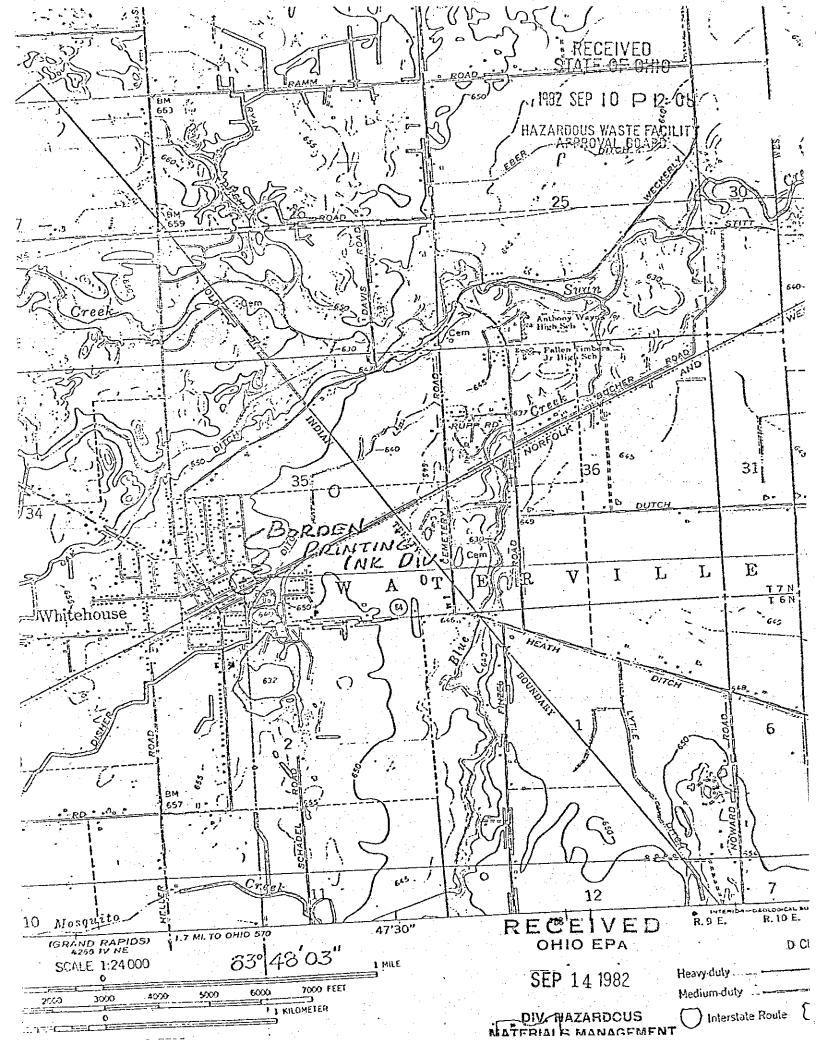
### II. General Post-Closure Activities

- A. Security will be maintained by fence around the facility with a monthly inspection of the area.
- B. The location, quantity and type of hazardous waste at the faciity will be documented by the current RCRA permit application and record keeping of subsequent activity. Any movement of hazardous waste within or from the facility will be recorded.
- C. No food chain crop will be permitted on the RCRA facility, unless no impact can be determined.
- D. These activities will continue after closure with a time that the Regional Administrator determines is sufficient.

### III. Specific Closure and Post-Closure Activities for Facility

### A. Drums.

- 1. Full drums will be transported for proper disposal.
- 2. Empty drums in which hazardous materials have been stored will be triple rinsed with an appropriate solvent.
- 3. Leaking drums of hazardous material will be enclosed in an over-pack drum for disposal.



### RECEIVED STATE OF OHIO

P 12: 06 1932 SEP 10

HAZARDOUS WASTE FACILITY APPROVAL BOARD

DIV. HAZARDOUS MATERIALS MANAGEMENT

↑ 6 N T 7 N 83 \* 52/30" 5657 generally visible on aerial photographs. This information is unchecked Fine red dashed lines indicate selected fence and field lines where Land lines north of Fulton Line based on the Michigan Meridian Land lines south of Fulton Line based on the First Principal Meridian zone 17, shown in blue Control by USGS and USC&GS Mapped, edited, and published by the Geological Survey Polyconic projection. 1000-meter Universal Transverse Mercator grid ticks. Topography by planetable surveys 1925. 10,000-foot grid based on Ohio coordinate system, north zone Latitude: Whitehouse, 6725 Gilead Street Division of Printing Longitude: 380 MANORE 1927 North American datum G. Ink Division, 0 Ohio Borden, HOTIO N ... 019 Incorporated Revised 1964 051 Borden Chemical O D<sub>o</sub> 262. 11 630 000 10 E. 7. 1 270000m.E. DAD: CLASSIFICATION U.S. Route WHITEHOUSE, OHIO AMS 4267 III SE-SERIES V852 SE/4 SWANTON 15' QUADRANGLE N4130-W8345/7.5 Unimproved dirt Light-duty ... 1964 State Route MEYER 61 83 45 WATERVILLE 1.7 MI. BOWLING GREEN 11 MI. 1398000m.N. 003 40 RECEIVE OHIO EPA D S SEP 14 1982

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V. DESCRIPTION OF HAZARDOUS WA ES (continued)	TON PAGE 3. RECEIVED
	STATE OF OHIO
	1982 SEP 10 P 12: 0b
	HAZARDOUS WASTE FACILITY APPROVAL BOARD
	RECEIVED OHIO EPA SEP 14 1982
	SEP 14 1992
	DIV. HAZARDOUS MATERIALS MANAGEMENT
	MENT
EPA I.D. NO. (anter from page 1)	
FOHD005043740 6	
V. FACILITY DRAWING  All existing facilities must include in the space provided on page 5 a scale drawing of the facilities	ty (see instructions for more detail).
VI. PHOTOGRAPHS	
All existing facilities must include photographs (aerial or ground—level) that clearl treatment and disposal areas; and sites of future storage, treatment or disposal area	
VII. FACILITY GEOGRAPHIC LOCATION	LONGITUDE (degrees, minutes, & seconds)
4131050	08348030
VIII. FACILITY OWNER	
A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, skip to Section IX below.	
B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, c	2. PHONE NO. foreg code
É Borden Inc	611412121514
19 19	35 31 - 31 37 - 61 12 OR YOWN S.ST. 6. ZIP CODE
F 180 E Broad St. G Columbus	
IX. OWNER CERTIFICATION	
I certify under penalty of law that I have personally examined and am familiar w documents, and that based on my inquiry of those individuals immediately respo submitted information is true, accurate, and complete. I am aware that there are including the possibility of fine and imprisonment.	insible for obtaining the information, I believe that t
Robert W. Gulheit, President B. SIGNATURE	C. DATE SIGNED
Borden Chemical  X OPERATOR CERTIFICATION	//teclerc>   11/17/80
y under penalty of law that I have personally examined and am familiar v	with the information submitted in this and all attachs
acments, and that based on my inquiry of those individuals immediately response	onsible for obtaining the information, I believe that

including the possibility of fine and imprisonment.

D. SIGNATURE

submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information,

C. DATE SIGNED

PROCESSES (continued)

SPACE FOR ADDITIONAL PROCESS CODE:
INCLUDE DESIGN CAPACITY.

FOR DESCRIBING OTHER PROCESSES (code

(04"). FOR EACH PROCESS ENTERED HERE
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RECEIVED STATE OF OHIO

1982 SEP 10 P 12: 06

HAZARDOUS WASTE FACILITY
APPROVAL BOARD

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V. DESCRIPT	ION OF	ひょうょりり	Otto Bar	~~~~
	1011 07	- LM. C. (N. N. H.	MIRIN SY A	X1 F X

- LEPA HAZARDOUS WASTE NUMBER Enter the four—digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If y handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number(s) from 40 CFR, Subpart C that describes the character and/or the toxic contaminants of those hazardous wastes.
- 5. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be hand which possess that characteristic or contaminant.
- : UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	4.1	METRIC UNIT OF MEASURE	<u>ሮ</u> ሰክ
DUNDSP		KILOGRAMS	
rons.,,		METRIC TONS	M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking i account the appropriate density or specific gravity of the waste.

### PROCESSES

- 1. PROCESS CODES:
  - For listed hazardous wasta: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item to indicate how the waste will be stored, treated, and/or disposed of at the facility.
  - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process or contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that post that characteristic or toxic contaminant.
  - Note: Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B,C, and D by estimating the total and control and describing all the processors by itself and the same line complete columns B,C, and D by estimating the total and
- quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.

  2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line e "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV Ishown in line numbers X-1, X-2, X-3, and X-4 below! — A facility will treat and dispose of an estimated 900 por per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non—listed wastes. Two waste corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 200 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

L:I		AZARD. B. ESTIMATED ANNUAL		C. UNIT		D. PROCESSES							
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III. OPERATOR INFORMATION			
	A. NAME	APPI	UYAL CUANU 3. Is the name list
<b>~</b> 1			Item VIII-A all
Borden Inc			Owner
			YES 🗆
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C. STATUS OF OPERATOR (Enter the appro	printe letter into the answer hor	if "Other" medical	TO DESCRIPTION OF THE PARTY OF
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		C.STATE H. ZIPC	ODE IX. INDIAN LAND
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B. UIC (Underground Injection of Fluids)	E OTHER (spi	clfy) ····································	The state of the s
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C. RCRA (Hazerdous Wastes)	E. OTHER (SP	cifyl	The state of the s
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XI. MAP		10	
XI. MAP		30	
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PARTHON OF ENVIRON	MENTAL PROTECTION AGENCY RAL INFORMATION	I, EPA I, D. NUMBER
Cons	olidated Pomoirs Program	FEOGN D 0 5 0 4 3 7 4 0
GENERAL (Read the "Ge	neral Instructions" before starting.)	GENERAL INSTRUCTIONS
TABECILEMS CONTINUES		If a preprinted label has been provided,
I, EPA I.D. NUMBER	//////////////////////////////////////	(if in the daighted tosce. Review the intestion cerefully, if any of it is rect.
		through it and enter the con si
III. FACILITY NAME	SAZMI / / / / MZAX	Pespiophate fill-thates below. If at
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V. MAILING ADDRESS PLASE PLASE PLASE	CE LYBEL IN 11112 SI YOU	proper fill-in area(s) below. If the lat complete and correct, you need not con-
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		must be completed regardless). Comple
FACILITY		Items If no label has been provided, Re-
VI-LOCATION \		tions and for the legal authorizations
		which this data is collected.
II. POLLUTANT CHARACTERISTICS		
	hashar you pood to cubmit any permit application	in forms to the EPA. If you enswer "yes" to
INSTRUCTIONS: Complete A through I to determine Williams questions, you must submit this form and the supplement	of form listed in the parenthesis following the qu	lestion. Mark "X" in the box in the third colu
if the supplemental form is attoched, it you answer into its excluded from parmit requirements; see Section C of the	instructions. See also, Section D of the instruction	ns for definitions of bold—faced tams.
	MARK'X'	
SPECIFIC QUESTIONS	ARE NO PASSONED	
A. Is this facility a publicly owned treatment works	l l l l l l l l l l l l l l l l l l l	y (either existing or proposed) I animal feeding operation or
which results in a discharge to waters of the U.S.	lar languation animal product	tion facility which results in a
(FORM 2A)	discharge to waters of t	ity (other than those described
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in	In A or B above, which	ch will result in a discharge to
A or B above? (FORM 2C)	waters of the U.S.? (FC	(2D) 22   24
E. Does or will this facility treat, store, or dispose of	l le municipal affluent ball	ject at this facility industrial or ow the lowermost stratum con-
hazardous wastes? (FORM 3)	1 - 1 A + tologo within ODS C	nuarter mile of the well bore. I is to
	underground sources o	f drinking water? (FORM 4)
G. Do you or will you inject at this facility any produced	H. Do you or will you in	ject at this facility fluids for spe-
water or other fluids which are brought to the surface in connection with conventional oil or natural gas pro-	X nrocess solution mini	mining of sulfur by the Fresching of minerals, in situ combus-
tursion inject fluids used for enhanced recovery of	tion of fossil fuel, or	recovery of geothermal energy?
oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)	(FORM 4)	37 31
The same familiar a proposed stationary source which it	J. Is this facility a prop	posed stationary source which is industrial categories listed in the
one of the 28 industrial categories-listed-in-the-in structions and which will potentially emit 100 ton	industrial and which	h will potentially emit 250 tons
19 TEDGLE DELECTION TO THE PART OF THE PAR	5)	Ilutant regulated under the Clean ct or be located in an attainment X
Clean Air Act and may affect or be located in a attainment area? (FORM 5)	40 A1 A2 BYD27 (FORM 5)	41
III. NAME OF FACILITY		
	Printing Ink	
1 skip Borden Chemica.	r r r in t r in E r in K	
IV. FACILITY CONTACT		
A. NAME OTITLE (lost,	first, & title)	B, PHONE (area code & no.)
		4 1 9 8 7 7 5 3 9 2
2Shadle, TW Lab Pr	o d d C L L O II M B L L	41 31 32 33
V. FACILITY MAILING ADDRESS		
A. STREET OR P.	o. BOX	and the state of t
36725 Gilead Stre	e.t.	
E. CITY OR TOWN	C.STATE D. ZIP	CODE
c		DEA
4Whitehouse	10 H 4 3	THE CENTER
13 IA		
VI. FACILITY LOCATION	A SPECIFIC IDENTIFIER	OFF.
A.STREEL, HOULE NO.		9EP 14.1995 计图
5Same	<u>, , , , , , , , , , , , , , , , , , , </u>	
D. COUNTY NAME		DIV. HAZABAL
<u> </u>	THE COLUMN	MATERIALS MANAGEMENT
LUCAS	70	and the first of the second start to have been a second to the second se
C. CITY OR TOWN	D.STATE E. 2)	P CODE F. COUNTY CODE
6 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		

PART 1. GENERAL INFORMATION	140
Print Ink Address: 6725 G	ou Se
1	392
Facility Operator: Same as a bove Title: Telephone:	
Facility Owner: Borden Inc. Address: 180 E. Broad St.	
City: Columbus State: $OH$ Zip Code: 432/5 Telephone: $(6/4)$ 225-	- 4000
Type of Ownership: V Private Government State HWFAB No. C3-48-146	
Date of Inspection: 6-28-82 Time of Inspection: (Start) (Finish)	
	: :
Weather Conditions:	
	•
INSPECTION PARTICIPANT(S)	
(Name) (Title) (Telephone)	
1. Thomas W. Shadle Plant Manager 419-8775392	392
2	
3.	.

Yes, See Remark #

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### RCRA INTERIM STATUS INSPECTION FORM

4.	ω		 	P	· · ·	4.	ω	2			
Does this facility store, treat or dispose of any hazardous waste from any off-site domestic sources:		b) Non-Listed Wastes: D001 D002 C D003 R D0000 T	a) Listed Wastes: $KO86$	Specific hazardous wastes handled at this facility (EPA HW#):	Type(s) of hazardous waste site activity: AGeneration BStorage CTreatment DTransportation EDisposal				Dave Ferguson Environmental Scientist (419) 352-8461	(Name) (Title)	INSPECTOR(S)

- Does this facility store, treat or dispose of any hazardous waste from any foreign sources? മ
- Yes, See Remark #
- Does this facility transport hazardous waste materials off-site for itself or other generators? တံ
- Yes, Complete Part 3 (Transp.)
- a) Applicable U.S. EPA I.D. Number
- b) Ohio P.U.C.O. GR TRSF Number
- 7. A brief description of site activity:
- The mixing, blending and dispersing of colorants into of the printing industry Servicing Printing inks and

REMARKS, PART 1. (GENERAL INFORMATION)

·			٠	ယ	70	-		D	. <del></del>	À	Ś
d) "Danger-Unauthorized Personnel Keep Out" signs at each entrance to the active portion of the facility (265.14(c) and 3745-55-14-C).	c) Controlled entry (gates, monitors) to the active portion of the facility at all times (265.14(2)(ii) and 3745-55-14-B-2-b).	<ul> <li>b) Artificial or natural barrier completely surrounding the active portion of the facility.</li> </ul>	a) 24 hour surveillance system.	If required due to the actual hazards associated with the waste material, the operator has prevented unauthorized access to the active portions of the facility and has provided the following features and equipment (Sections 265.14 and 3745-55-14).	2	The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Sections 265.13(a)(1) and 3745-55-13-A-2.	Subpart B: General Facility Standards	Contingency and Emergency 6: Closure		SUBPARTS INCLUDED	GENERAL INTERIM STATUS REQUIREMENTS
_					K		Yes		Financial		
			<				8		al Re	ŕ	
							N/A		quire		
				nor A			Remark #		Requirements		

- a) Inspect emergency equipment.
- b) Inspect monitoring equipment.
- c) Inspect security, alarm and communications devices.
- d) Inspect process equipment (pipes, pumps, etc.).
- e) Inspect containment structures (dikes, curbs, etc.).
- Inspect facility for structural malfunctions (roof, floor, etc.).
- g) Inspect hazardous waste handling/loading areas each day used.
- Record of any malfunctions due to equipment or operator errors. Ē
- i) Record of any hazardous waste discharges.
- The facility has provided a Personnel Training Program in compliance with Sections 265.16(a)(b)(c) and 3745-55-16-A-B-C including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. ĸ,
- D-E including written job titles, job descriptions and documented employee train-The facility keeps all records required by Sections 265.16(d)(e) and 3745-55-16ing records. ڻ
- If required due to the actual hazards associated with Ignitable, Reactive or in-(Seccompatible waste materials, the facility meets the following requirements tions 265.17 and 3745-55-17).

If so wh 34	All as	<del>d</del>	<b>C</b> )	<b>b</b> )	a)	Ci.	Has thi		<b>±</b>	$\omega$	ت	ت	
If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled (Sections 265.34 and 3745-55-34).	All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33 and 3745-55-33).	Water at adequate volume and pressure via hoses sprinklers, foamers or sprayers.	le fire control equipment.	Access to telephone, radio or other device for summoning emergency assis-	Internal alarm system	If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32 and 3745-55-32).	Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31 and 3745-55-31).	Subpart C: Preparedness and Prevention	Any co-mingling of waste materials is done in a controlled, safe manner as prescribed by Sections 265.17(b) and 3745-55-17-B.	itable or Ke	Physical separation of incompatible waste materials.	Protection from sources of ignition.	NOW INTENTION
	K	K	1	K	k	K			1	K			Yes
							K						No
													N/A
					12								Remark #

Yes No N/A Remark #

adequate aisle space to allow unobstructed movement or emergency or spill If required due to the actual hazards associated with the waste material, control equipment is maintained (265.35 and 3745-55-35). Ś

service authorities to familiarize them with the possible hazards and the fa-If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency cility layout (265.37(a) and 3745-55-37-A). ó

into any proposed special arrangements or agreements the refusal has been documented (265.37(b) and 3745-55-37-8). Where state or local emergency service authorities have declined to enter

## Subpart D: Contingency and Emergency

The facility has a written Contingency Plan designed to minimize hazards from fires, explosions or unplanned releases of hazardous wastes (265.51 and 3745and contains the following components:

Actions to be taken by personnel in the event of an emergency incident.

Arrangements or agreements with local or state emergency authorities. <u>\_</u>

Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. Ĉ

A list of all emergency equipment including location, physical description and outline of capabilities. 7

If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel (Sections 265.51(f) and 3745-55-51-6) à

A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all Local and State emergency service authorities that might be required to participate in the execution of the plan. (Sections 265.53 and 3745-55-53). ç,

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5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56	An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan (Sections 265. 55 and 3745-55-55).	The plan is revised in response to facility, equipment and personnel changes or failure of the plan (265.54 and 3745-55-54).	
	1		Yes
			8
K			N/A
			Remark #

# Subpart E: Manifests/Records/Reporting

SIE. THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

•	•			<b>.</b>	
<u>d</u> )	c)	<b>(</b> d	a)	The	
A description of he method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).	The estimated (or actual) weight, volume or density of the waste material(s).	Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).	Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment storage or disposal (262.73(b)(1) and 3745-55-73-B-1).	The operator maintains a written operating record at his facility as required by Sections 265.73 and 3745-55-73 which contains the following information:	
		1	K	1	Yes
					No
					N/A
					Remark #

## RCRA INTERIM STATUS INSPECTION FORM

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Remark

N/A

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Yes

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he facility.	
ne present physical location of each hazardous waste within the facility.	
) hazardous	
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The present physical	
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- FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s) (265.73(b)(2) and 3745-55-73-B-2).
- Records of any waste analyses and trial tests required to be performed. Ĝ
- Records of the inspections required under Sections 265.15 and 3745-55-15 (General Inspection Requirements - Subpart B). \_
- Records of any monitoring, testing or analytical data required under other Subparts as referenced by Sections 265.73(b)(6) and 3745-55-73-B-6.
  - Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart H and Section 3745-56-30, 32 and 34. ,,,,,,
- The operator has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Sections 265.75 and 3745-55-75. å

THIS REPORT IS NOT THE SAME AS THE REPORT REQUIRED TO BE FILED BY GENERATORS UNDER SECTIONS 262.41 AND 3745-52-41. NOTE:

When applicable, the operator has submitted reports on releases of hazardous wastes, fires, explosions, groundwater contamination data and facility closure (265.77 and 3745-55-77). <del>ر</del>س

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES. NOTE:

Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years (Sections 265.71 and 3745-55-71).

### RCRA INTERIM STATUS INSPECTION FORM

Yes

등

NA

Remark

- If shipping papers are used in lieu of manifests (bulk shipments, etc. the same requirements are met (265.71(b) and 3745-55-71-8).
- Any significant discrepancies in the manifest, as defined in Sections 265.72(a) and 3745-55-72-A, are noted in writing on the manifest document (Sections 265.71(a)(2) and 3745-55-71-A-2).
- ဌာ Any manifest discrepancies have been reconciled within 15 days as required by Sections 265.72(b) and 3745-55-72-B or the operator has submitted the required information to the Regional Administrator/Director.
- 6 posal an unmanifested waste report containing all the information required by Sections 265.76 and 3745-55-76 has been submitted to the Regional Administrator, Director within 15 days. sources If the facility has accepted any unmanifested hazardous wastes from off-site (except from small quantity generators) for treatment, storage or dis-

### Subpart F: Groundwater Monitoring

AND AFTER NOVEMBER 19, 1981. THESE REQUIREMENTS ARE APPLICABLE TO SURFACE IMPOUNDMENTS, LANDFILLS AND LAND TREATMENT FACILITIES ON

Yes

S

Remark #

The facility has implemented one or more of the following alternatives with respect to the Groundwater Monitoring requirements in Sections 265.90(a) and 3745-

A Groundwater Monitoring System meeting the minimum requirements of Sections 265.91 and 3745-55-91 has been installed which is sampled, tested and operated in accordance with the requirements of Sections 265.92, 265.93, 265.94, 3745-55-92, -93 and -94

=12

Remark

N/A 2 Yes A waiver of all or part of the Groundwater Monitoring requirements has been obtained by demonstrating a low potential for the migration of hazardous wastes and constituents in accordance with the requirements of Sections 265.90(c) and 3745-55-91-C.

9

Plan that was first submitted to the Regional Administrator/Director was implemented and is operated and maintained in accordance with Sections 265.90(d) and 3745-55-90-D. An alternate Groundwater Monitoring System  $\hat{\sigma}$ 

### Closure and Post-Closure Subpart 6:

THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES: NOTE:

2	
Yes	31
	tains the following
. 1	and cor
	n Closure Plan is on file at the facility and contains the following: (Sections 265.112 and 3745-56-03)
	A written

A description of how and when the facility will be closed (265.112(a)(l) and 3745-56-03-A-1). 

elements:

- A description of how any of the applicable closure requirements in other Subparts of Sections 265 and 3745-55,-56,-57,-58 (Tanks, Surface Impoundments, Landfills, etc.) will be carried out.  $\hat{\Delta}$
- An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. Ü
- A description of steps taken to decontaminate facility equipment. ç
- The year closure is expected to begin and a list of dates over which the various phases of closure are expected to be completed. a
- The Closure Flan has been amended within 60 days in response to any changes in facility design, processes or closure dates.

### RCRA INTERIM STATUS INSPECTION FORM

ထ္	7.	. 6	5.	NOTE:				4.	ω	
The Owner/Operator has submitted all of the information on prior use of the property required in Sections 265.119 and 3745-56-10 to the Local Land Authority within 90 days after Closure is completed.	The Post-Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning Closure.	The Post-Closure Plan has been amended within 60 days in response to any changes in facility design or operation.	A written Post-Closure Plan is on file at the facility which describes all Post-Closure activities and addresses all of the plan elements required by Sections 265.118(a) and 3745-56-08-A.	: THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY DISPOSAL FACILITIES.	c) Completion of Closure has been certified to the Regional Administrator by the Owner/Operator and an independent Professional Engineer (265.115 and 3745-56-06).	<ul> <li>b) Upon completion of Closure all facility equipment and structures were de- contaminated and any hazardous residues were properly disposed of (265.114 and 3745-56-05).</li> </ul>	a) The facility has been closed within the time limits specified in Sections 265.113 and 3745-56-04.	If Closure has been completed, the facility was closed in a manner which minimizes any future problems in compliance with the Closure performance standard in Sections 265.111 and 3745-56-02.	The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process.	
										Yes
	1	1	1							No
										N/A Remark #

yes No N/A Remark #

strument which will notify any potential purchaser that the property has been The property owner has attached a notation to the property deed or other inused to manage hazardous waste and future use of the property is restricted under Sections 265.117(c) and 3745-56-08-C as required in Sections 265.120 and 3745-56-10. တ်

### Subpart H: Financial Requirements

A written cost estimate for Closure of the facility (by the methods and procedures specified in the facility Closure Plan) is available for review on and after May 19, 1981 (Sections 265.142 and 3745-56-32). REGULATIONS PROMULGATED IN 46 FR 2877-2892 IN REGARD TO FINANCIAL REQUIREMENTS HAVE BEEN STAYED UNTIL OCTOBER 13, 1981 AND MAY BE AMENDED OR REPROPOSED AT THAT TIME. NOTE:

# REMARKS, PART 4. GENERAL INTERIM STATUS REQUIREMENTS

### RCRA INTERIM STATUS INSPECTION FORM

	NOTE:	2. II	 		X: S: M:	PART 5.
Containers holding Ignitable or Reactive waste(s) are located at least 50 (15 Meters) from the property line and the general requirements for handlesuch wastes in Sections 265.17 and 3745-55-17-B (physical separation, signand safety) are met (265.176 and 3745-56).		The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented (265.174 and 3745-56-54).	Hazardous wastes are stored in closed containers which are in good physica condition and are compatible with the wastes stored in them (Sections 265.171, .172, .173 and 3745-56-51,-52-53).		Management of Contai Management of Tanks Surface Impoundments	
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holding Ignitable or Reactive we from the property line and the in Sections 265.17 and 3745-55 are met (265.176 and 3745-56).	ONG TERM E ACTUALL D 3745-52	are store and such	d in clos le with t 6-51,-52-	lso.		JUSAL
and the and the 3745-55	STORAGE Y OFFER 2)	d is in inspect	ed cont the wast	Subpart I:	N. H. Ha	
aste(s) genera -17-B (	ARE NOT	spected ions are	ainers v es store	1	Waste Piles Land Treatment Landfills	SUBPAF
Containers holding Ignitable or Reactive waste(s) are located at least 50 (15 Meters) from the property line and the general requirements for handle such wastes in Sections 265.17 and 3745-55-17-B (physical separation, signand safety) are met (265.176 and 3745-56).	FACILITIES OPTING FOR LONG TERM STORAGE ARE NOT REQUIRED TO MEET PRE-TIUNTIL THE CONTAINERS ARE ACTUALLY OFFERED FOR TRANSPORT AND ARE NOT REDUCTED FOR TRANSPORT AND ARE NOT FOR TRANSPORT FOR TRANSPORT AND ARE NOT FOR TRANSPORT FOR TRANSPORT AND ARE NOT	for evida documeni	hich are d in the	Management of Containers	s ment	SUBPARTS INCLUDED
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	NOT REQU	eaks or 174 and	physical ms 265.	lers	Incir Thern Chem	
feet ing ns	INSPORT I	: 	1-	l≾	Incinerators Thermal Treatment Chemical/Physical	
	LABELING O AFFIX A		1	Yes No	ment ical/Bio	
	RANSPORT LABELING REQUIREMENTS QUIRED TO AFFIX AN ACCUMULATION  Yes No N/A Remar		.	N/A	nerators mal Treatment ical/Physical/Biological Treatment	
	<u>~</u> 🗹					

Containers holding hazardous wastes are never stored near other materials which may interact with the waste in a hazardous manner (Sections 265.177 (C) and 3745-56-57-C). ŝ

### Subpart J: Storage in Tanks

- The tank(s) are operated in compliance with the safety requirements of Sections 265.17, 265.192(b), 3745-55-17 and 3745-56-72-8 and are equipped with a wasterfeet cutoff or bypass system as required in Sections 265.192(d) and 3745-56-72-
- Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide (265.192 (c) and 3745-56-72-6). S
- Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard (265.194 and 3745-56-74). ຕັ້
  - Weekly inspections are made of all tank construction materials and containment structures (265.194 and 3745-56-74).
- Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (Sections 265.193(a) and 3745-56-73-A). rς
- A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.
- Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record ā

Yes

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N/A

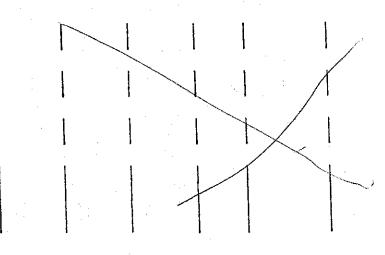
Remark #

With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods, (Sections 265.198(a) and 3745-56-78).

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- so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Sections 265.17(b) and 3745-55-17-B.
- 9 The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.
- Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code-1977) (Sections 265.198(b) and 3745-56-78-B).
- φ taminated tanks unless it is done under completely controlled and safe conditions as specified in Section 265.17(b) (Sections 265.199 and 3745-56-79). Incompatible waste materials are not placed in the same tanks or put in con-

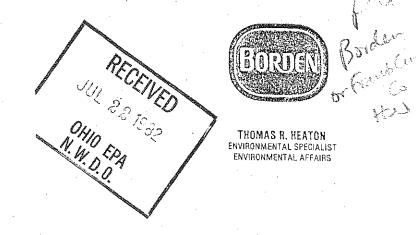
of (Sections 265.197 and 3745-56-77 Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed



### **BORDEN INC**

180 EAST BROAD STREET, COLUMBUS, OHIO 43215

July 15, 1982



USEPA Region V 111 West Jackson Blvd. Chicago, IL 60604

Attn: 5HW-TVB

Re: Hazardous Waste Sudden Accidental Liability Insurance

Dear Sirs:

Borden Inc. submits certificates of liability insurance for sudden accidental occurrences for the following facilities:

Borden Chemical, Woodlawn, OH OHD068932011 Post of the Chairman American Street of Press of Proposition of Street Borden Chemical, Delaware, OH OHD004297834 Columbus Coated Fabrics, Cols. OH OHD004294351 Borden Chem., St. Charles, IL ILD064017940 Borden Chem., Illiopolis, IL ILD005158548 Borden Chem., Cicero, IL ILD074367434 Pet-Ag Div., Borden Inc., Hampshire, IL ILD005468822 Borden Chem., Portage, MI MID092950195

If you have any questions, please call the undersigned at (614) 225-4860.

Sincerely,

Momas R. Heaton

TRH/slw

Encl.

CERTIFIED MAIL RETURN RECEIPT REQUESTED





Re: Application Number 81-HW-0146 Lucas County

September 3, 1981

Thomas W. Shadle Lab Production Manager Borden Chemical 6725 Gilead Street Whitehouse, Ohio 43591

Dear Mr. Shadle:

On August 26, 1981, Dave Ferguson of the Ohio EPA conducted an inspection of your facility, as part of the Hazardous Waste facility permit review process. Your facility was represented by yourself.

Enclosed are two forms. The one titled "TREATMENT, STORAGE AND DISPOSAL FACILITY" is a copy of the form used during the inspection to evaluate your facility.

The other form, "DEFICIENCY NOTIFICATION TABLE", relates to the "TREATMENT, STORAGE AND DISPOSAL FACILITY" form and specifies what action must be taken where deficiencies were noted. A mark in column four of the "DEFICIENCY NOTIFICATION TABLE" denotes a violation of current regulations or pinpoints areas which will be covered by regulations not yet effective. The capital letter codes in column four are explained on the last page of the "DEFICIENCY NOTIFICATION TABLE".

You are hereby advised that total compliance with the regulations contained in 40 CFR 265 is required as a condition of continuing interim status with the U.S. EPA. Failure to list specific deficiencies in this communication does not relieve you from the responsibility of complying with all applicable regulations.

Very truly yours,

Paul Flanigan, P.E.

Paul Flanidan

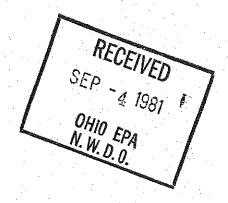
Hazardous Waste Materials Management

PF/bsr

cc: Kathleen Homer, U.S. EPA, Region V

Dave Ferguson, NWDO

CERTIFIED MAIL



### DEFICIENCY NOTIFICATION TABLE ISS INSPECTION

FACILITY NO. - 81-4W-0146

OWNER - Borden tracorporated

FACILITY NAME - Borden Chemical Printing Int

FACILITY LOCATION - 6725 Gilead Street Whitehouse, Ohro 4357/

FACILITY CONTACT - T.W. Shodle Lab Production Mar PHONE NO. - 419/877-5392

ISS INSPECTION DATE - Aug 26, 1981

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### KEY TO CODED ITEMS (COLL ) IV)

- A. Because the inspection at this facility was conducted prior to May 19, 1981, requirements which became effective on that date were not checked. These requirements are now effective and must be met as a condition of interim status under the federal regulations and as part of the considerations for issuance of an Ohio Hazardous Waste Permit.
- B. or C. The inspection revealed a deficiency in compliance with this item, which must be satisfactorily corrected. A determination of compliance will be made in the future.
- D. The inspection revealed a violation of regulations pertaining to this item. Since the environmental consequences of this violation may be quite serious this problem must be corrected as soon as possible. We will schedule another inspection no sooner than 20 days after the date of this letter to determine if compliance has been achieved. Further steps in the permitting process will be delayed until the re-inspection.
- E. Regulations concerning this item will become effective November 19, 1981. These requirements were not addressed in the inspection, but compliance is required by November 19, in order to meet federal interim status requirements and as a part of the considerations in issuing an Ohio Hazardous Waste Permit.
- F. Inspection revealed non compliance with this item. Compliance with this item is required unless a facility has filed as a storage facility. You should either correct the deficiency listed or file an amended Part A application for a storage facility.
- G. NFPA's code requires that the tanks be located 50 feet from the property line.

### TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A. - General Facility Standards

### I. General Information:

(A)	Facility Name: Borden Chemical Printing Tit
(B)	Street: 4.725 Gileau St.
(C)	City: Whitehouse: (D) State: 0// (E) Zip Code: 43.57/_
(F)	Phone: 119-877-5392 (6) County: 14C-CIS
(H)	Operator: Some as above
	Street:
(J)	City: (L) Zip Code
(M)	Phone: (N) County:
(0)	Owner: Borden Inc
	Street: 180 F. Broad-St.
(Q)	City: <u>Cols</u> (R) State: <u>OH</u> (S) Zip Code: <u>43-21.5</u>
(T)	Phone: 1-14-225-4000 (4) County: Frenklin
(V)	Date of Inspection: 8-26-8/(W) Time of Inspection (From) 1000 (To) 12:00
(X)	Weather Conditions: For 80*

· (Y)	Person(s) Interviewed  16. nes 16'-Shadle	Title Tolephone  1.6h/Productiontly: 410.67 735
(Z)	Inspection Participants  Description Francisco	Agency/Title Telephone
AA)	Preparer Information  Name  Done Torquisin	Agency/Title Telephone
	Complete sections I through VII f	SITE ACTIVITY:  for all treatment, storage, and/or disposal in parenthesis) in section VIII corresponding
	to the site activities identified	below:
<del>-1112-14-1</del> 2	A. Storage and/or Treatment 1. Containers (I) 2. Tanks (J)	D. Incineration and/or Thermal Treatment (O and P)
with the same of t	3. Surface impoundments (K) 4. Waste Piles (L) B. Land Treatment (M)	E. Chemical, Physical, and Biological Treatment (Q)
**************************************	C. Landfills (N)	•

Note: If facility is also a generator or transporter of hazardous was a complete sections IX and X of this form as appropriate.

### III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

			14.			
(A)	Has	the Regional Administrator	Yes	No	NI*	Remark
		en notified regarding:				
	and and	Receipt of hazardous waste from a foreign source?	WA	X		
	2.	Facility expansion?	NA	X	Segment sternient	
(B)	Gen	eral Waste Analysis:				
	1.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	.X.			
	2.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	X		Моўна оборошня мець	
	3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	X	**************************************	on agrandamental to a second and a second an	
C)	Sec	urity - Do security measures include (if applicable)	<b>2</b> *			
	1.	24-Hour surveillance?		X		ADT Alarm
	2.	Artificial or natural barrier around facility?	X			- the state of the
	3.	Controlled entry?	X		· ·	
	4.	Danger sign(s) at entrance?	Mila ninesulnay	X	milantifessoppings.	On Order
D)	Do O	wner or Operator Inspections ude:				•
	1.	Records of malfunctions?	X			•
	2.	Records of operator error?	X		C Control of the Cont	
	3.	Records of discharges?	Ž	AND DESCRIPTION OF THE PROPERTY OF THE PROPERT	*	
	144	,	4	- returning	endezionaturio)	

### III. GENERAL FACILITY STANDARDS - Continued

•	•	ar in the second of the second	Yes	No	NI*	Remarks
•	4.	Inspection schedule?	X	-		医骨骨 医骨骨 医骨骨 医骨骨 医骨骨 医皮肤
	5.	Safety, emergency equipment?	X	***	***	
	6.	Security devices?	X	***	<del> </del>	
	7.	Operating and structural · _ devices?	X	***	****	\$\tau\$\tau\$\tau\$\tau\$\tau\$\tau\$\tau\$\tau
	8.	Inspection log?	X	***	***	医乳蛋白蛋白 医食物 医乳蛋白 医乳蛋白 医食物 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤 医皮肤
(E)	No inc	personnel training records lude: (Effective 5/19/81)				•
	1.	Job titles?	X	***	***	
	2.	Job descriptions?	X		***	
	3.	Description of training?	X.	****	-	شهد بيود بيود بيود بيود بيود بيود بيود بيو
	4.	Records of training?	X		***	\$\ldot\tau\$\tau\tau\tau\tau\tau\tau\tau\tau\tau\tau
	5.	Have facility personnel received required training by 5-19-81?	X,	****	***	\$\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\
	6.	Do new personnel receive required training within six months?	X		***	
(F)	req	required are the following special uirements for ignitable, reactive, or compatible wastes addressed?				
	1.	Special handling?	X	derein der	elec for the	
	2.	No smoking signs?	X	***	***	ها ها جو
	3.	Separation and protection from ignition sources?	X	-	e()	

### IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

A )	Maintenance and Operation of Facility:	Yes	No	NI*	Remarks
	Is there any evidence of fire, . explosion, or release of hazardous waste or hazardous waste constituent?	The state of the s	X	<del>and a state of the state of th</del>	
8)	If required, does the facility have the following equipment:		•		
	1. Internal communications or alarm systems?	X	elzyki pozychowianyk	- <del>localistico ac</del> ia	
-	2. Telephone or 2-way radios at the scene of operations?	X	epinology.	and State of the S	
	3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	· · · · · · · · · · · · · · · · · · ·			
(c)	Tosting and Maintenance of				
(C)	Testing and Maintenance of Emergency Equipment:				
	1. Has the owner or operator established testing and maintenance procedures for emergency equipment?	X	ngap ngapapaniningang	- Wiji nahini garang.	Firex lanth inspe
	2. Is emergency equipment maintained in operable conditions?	X		**************************************	
(D)	Has owner or operator provided immediate access to internal alarms? (if needed)	X	diane disconsissioni		

\*Not Inspected

(E)	Is	there	adequate	e aisle	space
	for	unobs	tructed	movemen	nt?

12				9
X.				
	***************************************	***************************************		

### V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A)		s the Contingency Plan contain the lowing information:	Yes	No	NI*	Remarks
		The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the				
		requirements of this Part (as applicable.)	×		enterprise de la constante de	
	2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<u>X</u>	wandarkkinanip	***************************************	
	3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	$\times$	***********	and particular o	Strands and Statement Control of the Statement
	4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	X	Pour province		
-	5.	An evacuation plan for facility personnal where there is a possibilithat evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	ty ×			

### V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

		Yes	No	NI*	Remarks
(B)	Are copies of the Contingency Plan available at site and local emergency organizations?	X	wychonoraecistal	and physical speciments.	
(C)	Emergency Coordinator				
	1. Is the facility Emergency Coordinator identified?	X	eskayväävetsTP-644ss	appessaphalambarvasii	wisepartinght tumosephings to the legal debytes and a number of property of the first of the fir
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	X	no responsable de la constanta	OLIGINGO PAS	
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	X	#stamoshoom	Warning Married V	
(D)	Emergency Procedures				•
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<del>nja a pravenja</del> jija	u काहोजा चेन्न्य्येन्द्राज्ञ	X.	
	VI. MANIFEST SYSTEM, (Part 2	RECORD 65 Sub	KEEPIN part E	IG, AND	REPORTING
		Yes	No	NI*	Remarks
(A)	Use of Manifest System		•		
	1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<b>X</b>	diet Kreibitzininenstie	<u> Cirkuponekokkona</u>	Chem Het, Wyandot
	2. Are records of past shipments retained for 3 years?	e 1 <sup>-10</sup> Maria Patri	nika- medilikanshira	elapolitica y com	(Must be in Sutore)
(B)		$\geq$	/ 	s entranção po	
			•		

(C)	Oper	ating	Record
1-/	-ρc.	~~	110000000000000000000000000000000000000

- Does the owner or operator maintain an operating record as required in 265.73?
- 2. Does the operating record contain the following information:
  - \*\*b. The method(s) and date(s)
     of each waste's treatment,
     storage, or disposal as
     required in Appendix I?
    - c. The location and quantity of each hazardous wasts within the facility?
  - \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)
    - e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
    - f. Reports detailing all incidents that required implementation of the Contingency Plan?
    - g. All closure and post closure costs as applicable? (Effective 5-19-81)

11/A \_ \_ \_

× \_ \_ \_

<u>N/A</u> \_\_\_\_\_

<del>X</del> \_ \_ \_

<sup>\*\*</sup> See page 33252 of the May 19, 1980, Federal Register.

<sup>\*\*\*</sup> Only applies to disposal facilities

### VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

Yes No

NI\*

Remarks

A)	Clos	sure and Post Closure								
	1.	Is the facility closure	X	Samphallallelappy)	. Материализтору	Mahyunyukessayatyaka	nicitivately makes and more or the second	M director recognitive person (Notes to September 1988)		_
	2.	Has this plan been submitted to the Regional Administrator	<del></del>	$\sum$	40					
	3.	Has closure begun?	- Acceptant of the Control of the Co	X		T	omphic-less significant significant significant significant significant significant significant significant si	kirinar Mania danbaharangangan	<del></del>	_
	4.	Is closure estimate available by May 19, 1981?		any strategy desired to	<del>qualiphir-sen</del> tr	, edyskol mistoczalnicky kolytikus;	<del> </del>	shirassanounousionaassa as maakkii ja saa	<del>nindik folymala kalansasa sa kalansa ka</del>	···
(B)	Pos	t closure care and use of property								
	a pi	the owner or operator supplied ost closure monitoring plan? fective by May 19, 1981)			N/A	programp englandigh	70 <del></del>	MIANTENENS AND PROPERTY OF THE SECOND		· Lo draw
		VIII. FACI	LITY	STANDA						
		(Part 265, Su			nru R)					
		USE AND MANAGEM	bpart I ENT O	s I ti F CON	TAINER				,	
čaci	lity	USE AND MANAGEM	bpart I ENT O	s I ti F CON	TAINER	S Inspect	ion:	£	16.6/	
čaci	lity	USE AND MANAGEM	bpart I ENT O	s I th	TAINER			X	16.6/	-
aci		USE AND MANAGEM	bpart I ENT O	s I th	TAINER te of	Inspect		8-	16-61	h-con
₹aci	1.	Name: Becker	bpart I ENT O	s I th	TAINER te of	Inspect			268/	hear-
-aci	1.	Name: Book ondition?  Are containers in good condition?  Are containers compatible with	bpart I ENT O	s I th	TAINER te of	Inspect				the con-
€aci	1. 2.	Name: Beiden  Name: R  Are containers in good condition?  Are containers compatible with waste in them?	bpart I ENT O	s I th	TAINER te of	Inspect				*******
aci	1. 2. 3.	Name: Bridge AND MANAGEM  Are containers in good condition?  Are containers compatible with waste in them?  Are containers stored closed?  Are containers managed to prevent	bpart I ENT O	s I th	TAINER te of	Inspect				th-com-

	7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	-		***	aller den der der den de		, , ,
	8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			-	ngiyayan nga ngar ngir hijir h	ga nga nganga nga naka na na na	مين الله الله الله الله الله الله الله الل
		·T	J ANKS					:
Faci	lity	Name:		Date	of Insp	ection:		
	1.	Are tanks used to store only those wastes which will not cause corrosic leakage or premature failure of the tank?	on,					
	2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other contain ment structures?	,				Book Million	
•	3.	Do continuous feed systems have a waste-feed cutoff?				يه ميدن جيدي جيدي		
	4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	de diser	~ # <del>~</del>	<del>~~</del>	<b># 40 40 40 40 40</b>		; 
	5.	Are required daily and weekly inspections done?	***	,				
	6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	- Alberton Alberton				***	•••••••
	7.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)		· ·	***		-Minche with any site state of a	
							,	
		$m{p}_{i}$						

10

\*Not Inspected

Yes No

Remarks

STA LIVE TO					
•	**	Yes	No	NI*	Remarks
~	Has the owner or operator addressed the waste analysis requirements of 265.402?	<del>uit lives = u</del> op	Miching SEED, Michigan Joseph	#gOvercor kinerina is	
4.	Are inspection procedures followed according to 265.403?	Мациоризманда	man in the state of the state o	ند در المناسفة الأولى المناسفة	
5.	Are the special requirements fulfilled for ignitable or reactive wastes?	włanistrawsky	<del>Ny han'i Salaine di S</del>	<del>«Many) line</del> germyoga	
6.	Are incompatible wastes treated? (If yes, 265.17(b) applies.)		<del>(company)</del>	<del>- Pp-60 Coulombacher groups</del>	
	hazardous waste or that generate, stor is a hazardous waste where such wastew 402 or 307(b) of the Clean Water Act (tanks, transport vehicles, vessels, or hazardous only because they exhibit th or are listed as hazardous wastes in S Complete this section if the owner or o hazardous waste that is subsequently sh disposal.	33 U. contie cortiubpar	s.C. lainers rosivi	indicated in the second	to regulation under Sections seq.) and (2) neutralization neutralize wastes which are racteristic under 40 CFR §261.27 Part 261 only for this reason.
	1. MANIFES	T REQ	UIREME	ENTS	
	- Company of the Comp	Yes	No	NI*	Remarks
(A)	Does the operator have copies of the manifest available for review?	X	**************************************	princepture de la constante de	emplember of the same of the discount of the same of t
(B)	Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
	1. Manifest document number?	X	in the annual trappe	***************************************	
	<ol> <li>Name, mailing address, telephone number, and EPA ID Number of Generator</li> </ol>	X	minestraling many deve-	**************************************	

•	•		Yes	No	NI*	Remarks	The state of the s
	٥.	Name and EPA ID Number of Transporter(s)?	$\overline{X}$				
	4.	Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	X		<del>La parte de</del>		
•	5.	The description of the waste(s) (DOT shipping name, DOT hazard class DOT identification number)?	, <u>X</u>		-		
	6.	The total quantity of waste(s) and the type and number of containers loaded?	$\stackrel{\times}{\sim}$	<del></del>	· ·	was a second of the second of	
	7.	Required certification?	$\overline{\times}$		+2.1	*****	
	8.	Required_signatures?	$\overline{X}$		<del></del>		
(C)		es the owner or operator submit ception reports when needed?	$\times$		<del></del>	· · · · · · · · · · · · · · · · · · ·	
		2. PRE-TRANSF	PORT	REQUIRE	MENTS		
(A)	wit (Re	waste packaged in accordance th DOT Regulations? equired prior to movement of zardous waste off-site)	<u>×</u>	arrawania hali	· electronism		
(B)	in cor (Re	e waste packages marked and labeled accordance with DOT regulations ncerning hazardous waste materials? equired to movement of hazardous ste off-site)	X	-			
(C)	If to	required, are placards available transporters of hazardous waste?	X		***************************************	***************************************	

Remarks

NI\*

### VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

				Yes	No	MIX	Remarks
(A)	Exce	eptio Ilts	fests, Annual Reports, on Reports, and all test and analyses retained for three years?	<del>\\.</del>		**************************************	Philade (Section Section Section and Appropriate Communication Section
(B)	Annu	al R	generator submitted eports and Exception as required?	X		Singly deli Mari Jones unive	
			VII. INTERNAT	riona Sub	L SHIP part E	MENTS )	
			installation imported ted Hazardous Waste?	<del>Village and sta</del>	, <del>lebronce cijb</del>	audosfeliraspunacije.	
			(If answered Yes, complete the fo	ollow	ing as	applic	able.)
	1.	Expo has	orting Hazardous waste, a generator:				
		a.	Notified the Administrator in writing?	- Company - Comp	ін <i>ұ бердіну<u>і</u>стысты</i> ш	stock-workshops.	
		b.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	Explored should	<del></del>		
		C *´	Met the Manifest requirements?	simumentalis.	ADMINISTRAÇÃO	mongraphith or the second	
	2.		orting Hazardous Waste, the generator:				·
			Met the manifest requirements?		# <del>************************************</del>	eczycznowych	

### azardous • waste • facility • approval • board

James A. Rhodes, Governor Wayne S. Nichols, Chairman



Borden Chemical Printing Ink 6725 Gilead Street Whitehouse, Ohio 43571

Attn: T. W. Shadle

Re: Permit No. 03-48-0146

DEC 2 1981

### Dear Permittee:

Transmitted herewith is a certified copy of your Hazardous Waste Facility Installation and Operation Permit (Permit) as such permit was entered into the Journal of the Board. The permit consists of the following:

- 1) The standardized permit form (Findings and Conclusions and Issuance).
- 2) Terms and Conditions as approved by the Board (Special Terms and Conditions applicable to all permittees and Special Terms and Conditions for specific facilities).
- 3) Portions of the approved Part A permit application indicating the approved hazardous waste processes and design capacities and those hazardous wastes, identified by U.S. EPA Hazardous Waste Number, to be managed at the facility.

Processes, design capacities, and/or specific hazardous wastes which are stricken through or crossed out on the Part A permit application are not included in the approved permit. Unless otherwise notified by certified mail and afforded the opportunity for an adjudication hearing before the Board, all such deletions have occurred with the authorization of the applicant or his representative.

You are encouraged to carefully read the permit in its entirety. Any questions or comments concerning its content should be addressed to:

Ms. Peggy J. Vince Executive Director Hazardous Waste Facility Approval Board P.O. Box 1049

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 2 1981

RED BOARD'S JOURNAL

**EPA 9003** 

361 East Broad Street Columbus, OH 43216 Ph: (614)462-6981

HAZARADOUS WASTE FACILITY
APPROVAL EQUID

DEC 2 1981

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H.W.F.A.B. Page Two

YOU ARE HEREBY ADVISED THAT: All appeals of these matters are to the Court of Appeals of Franklin County, 369 South High St., Columbus, Ohio 43215, Attn: Deputy Clerk, and shall be pursuant to the provisions of Section 3734.05(C)(7) of the Revised Code.

Sincerely,

Peggy J. Vince

Executive Director

Peggy J. Vince

PJV/ss

Enclosure

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 2 1981

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### STATE OF OHIO

### HAZARDOUS WASTE FACILITY APPROVAL BOARD

In the Matter of:

Borden Chemical Printing Ink 6725 Gilead Street Whitehouse, Ohio 43571

Permit No. 03-48-0146

Applicant/Permittee

The operator of the belowreferenced hazardous waste facility

Borden Chemical Printing Ink 6725 Gilead Street Whitehouse, Ohio 43571

HAZARADOUS WASTE FACILITY,
APPROVAL BOARD

DEC 21981

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Facility

Pursuant to Section 3734.05(D) of the Revised Code, The Hazardous Waste Facility Approval Board (Board) makes the following Findings and Conclusions and issues a Hazardous Waste Facility Installation and Operation Permit (Permit)

### FINDINGS AND CONCLUSIONS

- The Applicant has submitted to the Board a completed permit application, stating the facility was in operation immediately prior to October 9, 1980, and has paid the required permit fee.
- 2. The Ohio Environmental Protection Agency (Agency) and/or the United States Environmental Protection Agency has inspected the facility and has prepared an Interim Status Standards Survey (survey).
- All public comments timely received have been reviewed, evaluated and considered by the Board and the Agency for their relevancy and materiality.
- 4. The Agency has reviewed and considered the information on the permit application, the results of the survey, the public comments, and other pertinent material and has concluded that the facility was in substantially compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980.

- 5. The Agency has informed the Applicant of the requirements of applicable hazardous waste rules of which it was not in compliance.
- 6. The Agency has recommended to the Board that a permit be issued to the facility.
- 7. Review and consideration of the information on the permit application, the results of the survey, the public comments, recommendations and comments by the Agency, and other pertinent material regarding the Applicant and the facility is sufficient to determine whether the facility meets the requirements for permit issuance set forth in Section 3734.05(D) of the Revised Code.
- 8. The staff of the Board has reviewed and considered the information on the permit application, the results of the survey, the public comments, the recommendation and comments by the Agency, and other pertinent material regarding the Applicant and the facility and has recommended to the Board that a permit be issued.
- 9. Pursuant to Resolution No. 168-81, passed September 15, 1981, the Board found that the facility:
  - a. Was in operation immediately prior to October 9, 1980,
  - b. Was in substantial compliance, as determined by the Director of Environmental Protection, with applicable statutes and rules in effect immediately prior to October 9, 1980,
  - c. Submitted a completed permit application, and
  - d. Has demonstrated to the Board that its operation after October 9, 1980 will comply with applicable performance standards adopted by the Director of Environmental Protection pursuant to division (D) of Section 3734.12 of the Revised Code.
- 10. Pursuant to such Resolution, the Board resolved and approved that a permit be issued with such standard terms and conditions set forth in the document entitled "Terms and Conditions" attached to the Resolution and such special terms and conditions as were approved by the Board.
- 11. The terms and conditions referenced in Finding Number 10 above, are attached hereto and incorporated herein.
- 12. Resolution No. 21-81, passed on August 26, 1981 and entered into the Journal of the Board on September 1, 1981, authorizes the Coordinator of the Board to:

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 21981

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- a. Authorize the staff of the Board to issue to the facilities the Hazardous Waste Facility Installation and Operation Permits approved for issuance by resolution of the Board, and
- b. Have signing authority indicating that such action has been approved by the Board.

NOW THEREFORE, A HAZARDOUS WASTE FACILITY INSTALLATION AND OPERATION PERMIT IS ISSUED TO THE Applicant for the facility, subject to the Terms and Conditions attached hereto and incorporated herein.

FOR THE BOARD, BY ORDER OF THE BOARD

Piggy J. Vince Dec. 2, 1981

Entered into the Journal of the Board on Olcoo, 1981 by

Madeline Samoen/sec.

HAZARADOUS WASTE FACILITY:
APPROVAL BOARD

DEC 21981

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ase print or type in the unshaded areas only in areas are spaced for elite type, i.e., 12 characters/inch).		81-1	TION AGENCY	Form Approved OMB	No. 158-RO	1/5	
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<u> </u>		//-		items I, III, V, an must be completed	regardiess).	Compl	ioto aii
FACILITY				items if no label ha	s been provi er detailed	ded. Re item o	eter to descrip
"LOCATION				tions and for the which this data is co	legal authori	zations	unde
	and the second	Tentanto de Salado					30.02
I. POLLUTANT CHARACTERISTICS			where any remit applicati	on forms to the EPA. If	von auzwet "	ves" to	anv
INSTRUCTIONS: Complete A through J to determine we questions, you must submit this form and the supplement	metner you tal form lis	ted in the	submit any period applicati parenthesis following the q	uestion. Mark "X" in the	box in the ti	hird col	umn
							Tanch
if the supplemental form is attached. If you answer no is excluded from permit requirements; see Section C of the	MARJ	12" 266 9120	), Section of the made to	313 101 03111111013		MARE	
SPECIFIC QUESTIONS		FORM ATTACHED		QUESTIONS	A K 2	HO R	PPACH!
A. Is this facility a publicly owned treatment works		Λ.	B. Does or will this facilities include a concentrate	d animal feeding operat	tion or	1	
which results in a discharge to waters of the U.S.? (FORM.2A)	1 1 1		discharge to waters of		19	20	31
C. Is this a facility which currently results in discharges	19 17 X	19	D. Is this a proposed faci	lity <i>(other than those de</i> ich will result in a disch	scribed	x	
to waters of the U.S. other than those described in A or 8 above? (FORM 2C)	22 23	24	waters of the U.S.? (FO	ORM 2D)	25	26-	and the second second
E. Does or will this facility treat, store, or dispose of		X	municipal affluent be	low the lowermost stratu	nu cou-	_	
hazardous wastes? (FORM 3)	X 28 25	30	u derground sources of	quarter mile of the we of drinking water? (FOR)	14)	X 32	33
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface			H. Do you or will you in	ject at this facility fluids	for spe-		
in connection with conventional oil or natural gas pro-	-		process solution min	i mining of sulfur by the ling of minerals, in situ	combus- 1	x	ļ
duction; inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid	3		(FORM 4)	recovery of geothermal	37	7 34	39
hydrocarbons? (FORM 4)  1. Is this facility a proposed stationary source which is	34 38 S	38	J. is this facility a prop	oosed stationary source industrial categories liste	which is		
one of the 28 industrial categories listed in the in structions and which will potentially emit 100 tons	5 .		I instructions and which	th will potentially emit all the control of the con	250 tons		
per year of any air pollutant regulated under the Clean Air Act and may affect or be located in a	e x	·	Air Act and may affe	ct or be located in an att	ainment	X 44	-
attainment area? (FORM 5)  III. NAME OF FACILITY	40 41	42	area? (FORM 5)			<b>*</b>	
skip Borden Chemical	1 P ~		ing Ink		1 1 1	1	
10 14 - 23 30	20 50 00 00 00 00				02000		
IV. FACILITY CONTACT	first, & tith	e)		B. PHONE (area code	& no.)		
	<del> </del>	tio	T M C T	4 1 9 8 7 7 5	302		
2 Shadle, TW Lab Pro	o d u c		n Mgr.	4 1 3 0 7 7 3	30	Seri ven	
V. FACILITY MAILING ADDRESS					Same Same	NOTE T	Per Q
A. STREET OR P.	3. BOX	111	<del></del>				1131
36725 Gilead Stre	<u>e.t.</u>		48				
B. CITY OR TOWN			C.STATE D. ZIP		ر در از این از در این از این از در دورود	9 <u>7</u> 10001	
4 W h i t e h o u s e			о н 4.3.5	7 HAZARADOUS	WASTE	<b>ACITI</b>	
VI. FACILITY LOCATION		The Marchan		en okomen		52 F.O	
A. STREET, ROUTE NO. OR OTHE	R SPECIFIC	CIDENTI	FIER		- G - 400		di
5Same				T T DF	S 2 198	၂၂ ၁	e e e e e e e e e e e e e e e e e e e
10 10 B. GOVATY NAME			45	3	O TABLE I	MONY	1
	1	-1-1		ENTERED B		JUNNA	_
LUCAS			79	CODE TE COUNTY		4	
C. CITY OR TOWN			D.STATE E. Zii	CODE F. COUNTY	n) i	)	· ·
	1 1	<del>- 1 - 1</del>		138.65	11.00 11.00	6.77	•
6	<del></del>		49 41 42 47	1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1		oy?.	

CONTINUED FROM THE FRONT				
VII. SIC CODES (4-digit; in order of priority)				Water State Very State Of The Control
A. FIRST			B. SECOND	
7 2,8,9,3 Printing Ink		7 (spec	(vir)	46
C. THIRD			D. FOURTH	
- Andrewsky and	•	7 (spec	n(y)	
III. OPERATOR INFORMATION		15 16 19		
	A. NAME			B. Is the name listed
8 Borden Inc				item Ville Also ti
18 16	and the second s			X YES □ NO
		and the particular terms of the control of	The state of the s	. 66
C. STATUS OF OPERATOR (Enter the app.  F = FEDERAL M = PUBLIC (other than  C = STATE	(ederal or state)		(/y.) D. PHONE	(area code & no.)
S = STATE O = OTHER (specify)	On Charles A. A. 🚪	pecify)	A 6 1 4 2	2 5 4 0 0 0
E. STREET O	R P.O. BOX		15 16 - 18 1	B 21 22 2 15
180 E. Broad S.t.r.			\$P\$中国的 1	er en en grant ge
26	A Maria Managara de La Companya de L	35		
F. CITY OR TOW	N Training Section 1985 - British	G.STATE 'H.	ZIP CODE IX, INDIAN LAND	
8 Columbus		' '   , , , , , , , , , , , , , , , , ,	is the facility locate	d on Indian lands?
15 16		<u> </u>	3 2 1 9 □ YES	□ NO ⊠
X. EXISTING ENVIRONMENTAL PERMITS		ATTAN TANKAR APTE	• It	
A. NPDES (Discharges to Surface Water)	D. PSD (Air Emissions	from Proposed Source:		
9 N	9 8		The Williams of the second	
15 16 17 18	18 14 17 15		30	
B. UIC (Underground Injection of Fluids)	C 7 1 1 1 1 1	R (specify)	Call Marin Control of the Control of	
9 U	9	·	(specify)	
C. RCRA (Hazardous Wastes)	13 16 17 18		30	Constitution of the second
9 R	CIT III	R (specify)		
3 N   14 17 16 2	97 38 38	<u> </u>	(specify)	
XI. MAP	eresine progression		10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	Value of the state
Attach to this application a topographic ma the outline of the facility, the location of e	p of the area extending t	o at least one mile be		
the outline of the facility, the location of e treatment, storage, or disposal facilities, and	ach of its existing and p	roposed intake and o	discharge structures, each of	ne map must show . its hazardous wasse
treatment, storage, or disposal facilities, and water bodies in the map area. See instruction	s for precise requirement	cts fluids undergroui	nd. Include all springs, river	s and other surface
XII. NATURE OF BUSINESS (provide a brief descri				
The mixing hi			· ·	
inks and serve	ending and dispe- cing of the prin	rsing of color	ants into printing	
	crue or the brin	ting industry.	,	
	•		III710100IIC WACET	F1 (11 1992)
			HAZARADOUS WASTE	
The state of the s	•		APPROVAL BOAF	W
			DEC 2 198	14
		•	DEC 2 198	<i>i</i>
XIII. CERTIFICATION (see instructions)	<i>(,,,,,,,</i>			
		(2.540 p.) (5.00 p.)		
I certify under penalty of law that I have pattachments and that, based on my inquir	ersonally examined and a	m familiar with the i	information submitted in thi	s application and all
application, I believe that the information	C PERIO CONTINUE		for obtaining the informati	on contained in the
laise information, including the possibility o	f fine and imprisonment.	.picto. i dill ewale (i	uat there are significant pen	alties for submitting
Robert W. Gutheil, President	B. SIGNAT	URE		DATE SIGNED
		- <del>///-///</del>		
Gorden Chemical COMMENTS FOR OFFICIAL USE ONLY	1/20	16203601/	accellion !	11/90
C' CON OPPICIAL USE ONLY				
the state of the s		Son Alpha		
E form 3510-1 (6-80) REVERSE				55
= 0 + 11 to V to Clubs				
•				

EPA Form 3510-3 (6-80)

EPA form 3510-3 (6-80)

Will be deleting in schmissers of Part A reviews. Per phone conversation with me. Shodle Sept 2, 1851

Meth Right

CONTINUE ON REV

UL PROCES			1						
INCLUDE	DESTG	N CAPACITY.	· FC	H DE	SCR	BING O	THER PRO	OCESSES (code	"TO4 ). FOR EACH PROCESS ENTERED HERE
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				•					HAZARADOUS WASTE FACILITY APPROVAL BOARD
						-			
		•							DEC 21981
									FAITEDED POLIDES
									ENTERED BOARD'S JOURNAL
IV. DESCRI	PTIO	N OF HAZARDOUS WASTE	s	> 2 A	4			i <b>t</b> a in case se	
A. EPA HAZ.	ARDO ardous	US WASTE NUMBER - Enter	the	four-	digit ubor	number i	from 40 C	FR, Subpart D	for each listed hazardous waste you will handle. If you self from 40 CFR, Subpart C that describes the characteristics
basis, For which poss	each cl eas tha	INUAL QUANTITY — For each haracteristic or toxic contaminen it characteristic or contaminent.	list en	ed was tered i	n co	tered in umn A et	column A stimate the	estimate the q total annual qu	quantity of that weste that will be handled on an annual uantity of all the non-listed waste/s/ that will be handled
		•			•			•	Units of measure which must be used and the appropriate
codes are:									on most of which must be used and the appropriate
	POL	GLISH UNIT OF MEASURE				CODE		KILOGRAMS	TOF MEASURE CODE
If facility	records	s use any other unit of messure.	for	auenti	• • •	. T	06 management	METRIC TON	erted into one of the required units of measure taking into
		opriate density or specific gravity	of 1	he wa	ste.	io cints i	Of Industre	FIRUST DB CORVE	arted into one of the required units of measure taking into
D. PROCESSI	SS CC	DDES:						:"	
to indi	ed haz	eardous waste: For each listed him the waste will be stored, treate	aza: d, a	rdous : nd/ar :	wast dispo	entered sed of at	in column the facility	A select the co	ode/s/ from the list of process codes contained in Item !!!
									iumn A, select the code/s/ from the list of process codes spose of all the non-listed hazardous wastes that possess
l Note:	Four	SDRCOS are provided for antonio							
ŀ						p	- Att bedde	t' min mue memb	oer and the additional code(s).  Ocess in the space provided on the form,
NOTE: HAZ	ARDO	US WASTES DESCRIBED BY 1	<u>ብረ</u> ገር	2 Tu	A BI	NIC CO.			ocess in the space provided on the form.  NUMBER — Hazardous wastes that can be described by
l 1. Select	one of	the EPA Hazardous Mosto Alumb			1				i i i i i i i i i i i i i i i i i i i
i 2. In colu	mn A	Of the next line enter the other		۱		- 16fman 1	ot, store, a Number th	nd/or dispose of	mplets columns B.C. and D by estimating the total annual f the waste.  I to describe the waste. In column D(2) on that line enter
"includ 3. Repeat	led wit step 2	h above" and make no other entr for each other EPA Hazardous V	ies ( /ast	on that Num	t line ber t	iat can b	e used to c	lescribe the haz	tardous waste. In column D(2) on that line sater
EXAMPLE FO	OR CO	MPLETING ITEM IV (chause in	1:-		<b>.</b>				
l are corresive i	aniv sı	nd there will be an estimated 20 of that waste. Treatment will be	<u>م</u> 'م					CITA INCLINE VALLE	r treat and dispose of three non-listed wastes. Two wastes
A. EI	PA		G.	UNIT MEA-	0.00	n and di	sposar will	De in a landfill.	D. PROCESSES
ZO WASTI	ENO	B. ESTIMATED ANNUAL QUANTITY OF WASTE	S	u R E in ter		1. F	ROCESS (enter)		2. PROCESS DESCRIPTION
	1.000			ode)		0 3 D	TT.	1111	(if a code is not entered in D(1))
X-1 K 0.	5 4	900		P	T	0/3 D	8 0	į	
X-1 K 0 . X-2 D 0	5 4	900		P	T		1 1	1 1 1	
	5 4 0 2	manusar conservation of the conservation of th			T $T$		80		

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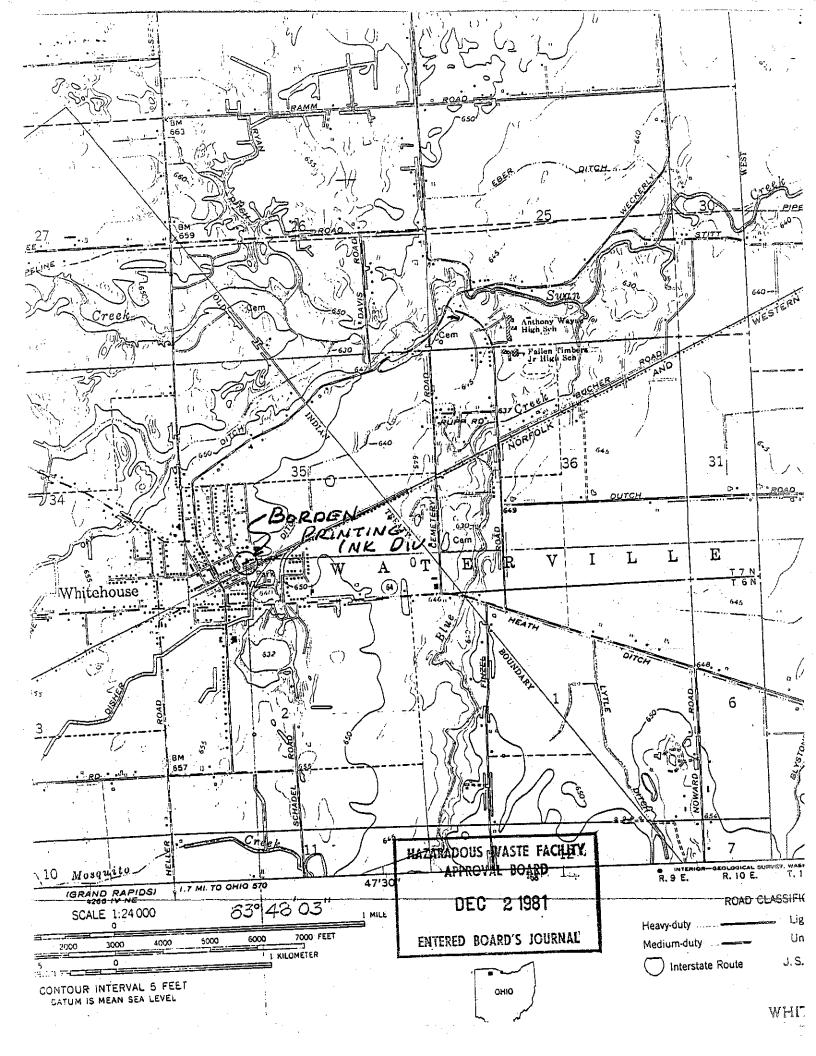
EPA Form 3510-3 (6-80)

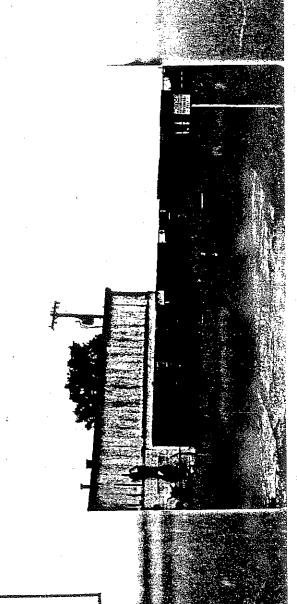
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WO H D	0 b	5 0 4 3 7 4 0 1		W		·	UP		7/A C D U P
		N OF HAZARDOUS WASTE	S (con		ed) 🔎		3 de 3 15		, PROCESSES
HAZ	EPA ZARD. STENO SF code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	OF ME SUR (ente	E r	1.	PROCES	S CODES		2, PROCESS DESCRIPTION (if a code is not entered in D(1))
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1 K 0	0 0	J4,000					1 1:		phone conversation with the.
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22								"	APPROVAL BOARD
23				[3]		1			DEC 2 1981
24		•		;. <sub>.</sub> .			1		ENTERED BOARD'S JOURNAL
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26		10 27	,	•	27 . 76	27 - 29	127 - 25		

41°30' L 83\*52'30" Control by USGS and USC&GS Mapped, edited, and published by the Geological Survey Land lines north of Fulton Line based on the Michigan Meridian zone 17, shown in blue generally visible on aerial photographs. This information is unchecked Fine red dashed lines indicate selected fence and field lines where Land lines south of Fulton Line based on the First Principal Meridian Topography by planetable surveys 1925. Revised 1964 1000-meter Universal Transverse Mercator grid licks. 10,000-fool grid based on Ohio coordinate system. north zone Polyconic projection. 1927 North American datum Printing Ink Division, Borden Chemical Map 1 of 1 Longitude: Whitehouse, Ohio 6725 Gilead Street Division of Borden, Incorporated **!atitude:** 2000mE 83°45' DAD CLASSIFICATION g U.S. Route State Route WHITEHOUSE, OHIO AMS 4267 III SE-SERIES V852 SE/4 SWANTON 15' QUADRANGLE Unimproved dirt ======= Light-duty.. N4130-W8345/7.5 19 WATERVILLE 1.7 MI. HAZARADOUS WASTE FACILITY APPROVAL BOARD 2 1981 DEC ENTERED BOARD'S JOURNAL

SCHWAMBERGER





HAZARADOUS WASTE FACILITY:
APPROVAL BOARD

DEC 2 1981

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#### TERMS AND CONDITIONS (General)

- 1. Only those hazardous wastes as identified by the U.S. EPA Hazardous Waste Number(s) set forth in the approved permit application, attached hereto, may be managed at the facility and only pursuant to the specified processes and design capacities indicated and set forth in the approved permit application.
- 2. The Permittee and the facility shall comply with all applicable performance standards adopted by the Director of Environmental Protection pursuant to Division (D) of Section 3734.12 of the Revised Code.
- 3. The Permittee and the facility shall comply with all applicable requirements of Chapter 3734 of the Revised Code, the Ohio Hazardous Waste Rules, and the federal statutes and regulations concerning hazardous waste.
- 4. This permit shall expire three years after its date of issuance. The date of issuance is the date the resolution to issue the permit was passed by the Board.
- 5. This permit, in accordance with the procedures of the Board, may be modified, revoked, or alternatively revoked and reissued, to comply with applicable provisions of Chapter 3734 of the Revised Code or the Ohio Hazardous Waste Rules.
- 6. The annual permit fee, payable to the Treasurer of State, shall be submitted to and received by the Board on or before the anniversaries of the date of issuance, during the term of the permit.
- 7. Unless otherwise specifically provided, all studies, reports, data, plans and other information required to be submitted by this permit shall be transmitted to:

Hazandous Waste Facility Approval Board P.O. Box 1049 361 East Broad Street Columbus, Ohio 43216

The permit number shall be indicated on the transmittal letter.

TERMS AND CONDITIONS (Special)

NOT APPLICABLE

HAZARADOUS WASTE FACILITY
APPROVAL BOARD

DEC 2 1981

ENTERED BOARD'S JOURNAL

# TREATMENT, STORAGE, AND DISPOSAL FACILITIES Form A. - General Facility Standards

#### I. General Information:

(A)	Facility Name: Borden Chemical Printing Int
	Street: 6725 Gilead St.
(C)	City: Whitehouses (D) State: OH (E) Zip Code: 4357/
	Phone: 419-877-5392 (G) County: <u>Lucas</u>
(H)	Operator: Same as above
(I)	Street:
(J)	City: (K) State: (L) Zip Code
	Phone: (N) County:
(0)	Owner: Borden Inc.
(P)	Street: 180 E. Broad St.
(Q)	City: <u>Cols.</u> (R) State: <u>OH</u> (S) Zip Code: <u>43315</u>
(T)	Phone: <u>(6/4-225-4000</u> (U) County: Franklin
(V)	Date of Inspection: 8-36-8/(W) Time of Inspection (From) 10:00 (To) 12:00
(X)	Weather Conditions: Fair 80°

·(Y)	Person(s) Interviewed	Title	Telephone
	Thomas W. Shadle	Lah/ Prochectum Mg	1 419 787 3395
(Z)	Inspection Participants	Agency/Title	Telephone
	Dave Ferguson	· ————————————————————————————————————	
A)	Preparer Information		
	Name Dave Ferguson.	Agency/Title OEPA, ES	Telephone 419-352-846/
	II.	SITE ACTIVITY:	
*	Complete sections I through VII for facilities. Complete the forms (in to the site activities identified by	n parenthesis) in section Vi	nd/or disposal II corresponding
		* *	•
			and the second of the second o
	A. Storage and/or Treatment Containers (I)	D. Incineration and (O and P)	or Thermal Treatment
· · · · · · · · · · · · · · · · · · ·	A. Storage and/or Treatment 1. Containers (I) 2. Tanks (J) 3. Surface Impoundments (K) 4. Waste Piles (L)	(O and P)  E. Chemical, Physic	or Thermal Treatment
	2. Tanks (J) 3. Surface Impoundments (K)	(O and P)	
	1. Containers (I) 2. Tanks (J) 3. Surface Impoundments (K) 4. Waste Piles (L)	(O and P)  E. Chemical, Physic	

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

# III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

			Yes	No	NI*	Remark
(A)	Has bee	the Regional Administrator notified regarding:				
	1.	Receipt of hazardous waste from a foreign source?	NA	<u> </u>	FILE COLUMN TO THE PARTY OF THE	
	2.	Facility expansion?	NA	X		
(B)	Gen	eral Waste Analysis:	•			
	1.	Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u> </u>			
	2.	Does the owner or operator have a detailed waste analysis plan on file at the facility?	X			,
	3.	Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	×	***	Deletarana.	
(C)	Sec	urity - Do security measures include (if applicable)	<b>.</b>			
	1.	24-Hour surveillance?		X	<b>60</b> 2.6	ADT Alarm
	2.	Artificial or natural barrier around facility?	X			
	3.	Controlled entry?	X	en e		
	4.	Danger sign(s) at entrance?	discussion of the second	X	«Фенликанару» -	On Order
(D)	Do Inc	Owner or Operator Inspections lude:	•			•
	1.	Records of malfunctions?	X	***********	-	
	2.	Records of operator error?	X	400000000000000000000000000000000000000		
		Records of discharges?	×	alman, and a second	•	

 $z_{i},v_{i}$ 

### Ili. GENERAL FACILITY STANDARDS - continued

•	·	•	Yes	No	NI*	Remarks
•	4.	Inspection schedule?	X	***		
	5.	Safety, emergency equipment?	X			***********
	6.	Security devices?	X			
	7.	Operating and structural - devices?	X			
	8.	Inspection log?	X		***	
(E)	Do inc	personnel training records lude: (Effective 5/19/81)				-
	٦.	Job titles?	X	***		
·	2.	Job descriptions?	X			
	3.	Description of training?	X.		***	
	4.	Records of training?	X			***
	5.	Have facility personnel received required training by 5-19-81?	X	***	***	****
	6.	Do new personnel receive required training within six months?	X		•••	*****
(F)	req	required are the following special quirements for ignitable, reactive, or compatible wastes addressed?	, * ,			
,	1.	Special handling?	X		***	
	2.	No smoking signs?	X	***	***	+4++++++++++++++++++++++++++++++++++++
	3.	Separation and protection from ignition sources?	X	•••		

\*Not Inspected

# IV. PREPAREDNESS AND PREVENTION: (Part 265 Subpart C)

(A) Maintenance and Operation of Facility:  Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?  (B) If required, does the facility have the following equipment:  1. Internal communications or alarm systems?  2. Telephone or 2-way radios at the scene of operations?  3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  On Cryy Water  (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal alarms? (if needed)						
Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?  (B) If required, does the facility have the following equipment:  1. Internal communications or alarm systems?  2. Telephone or 2-way radios at the scene of operations?  3. Portable fire extinguishers, fire control; spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  On City Water  (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment?  2. Is emergency equipment?  3. Exprex Gmth in Spc.  (D) Has owner or operator provided immediate access to internal	(A)		Yes	No	NI*	Remarks
have the following equipment:  1. Internal communications or alarm systems?  2. Telephone or 2-way radios at the scene of operations?  3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  On City Wafer  (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal		explosion, or release of hazardous		X		
alarm systems?  2. Telephone or 2-way radios at the scene of operations?  3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  On City Water  (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal	(B)	If required, does the facility have the following equipment:				<u>.</u>
at the scene of operations?  3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  On City Wafer  (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal		,	X	o <del>and and the control of the contro</del>		· · · · · · · · · · · · · · · · · · ·
fire control, spill control equipment and decontamination equipment?  Indicate the volume of water and/or foam available for fire control:  On City Wafer   (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal			X	no sumblections	Addition to the second of the	
Con City Water  (C) Testing and Maintenance of Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal		fire control, spill control equipment and decontamination	$\underline{X}$	qua — manataninananan	**************************************	
Emergency Equipment:  1. Has the owner or operator established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal		On City Water and/or	foam ava	nilable	for fi	ire control:
established testing and maintenance procedures for emergency equipment?  2. Is emergency equipment maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal	(C)					
maintained in operable conditions?  (D) Has owner or operator provided immediate access to internal		established testing and maintenance procedures	X	gen e-monocon	Alakanaganap	Firex, 6mth inspec
immediate access to internal		maintained in operable	· <u>X</u>	gi'	440 Minute School (School School (School School Sch	
	(D)	immediate access to internal	×	<u> </u>	مبدوبوس	

(E)	Ιs	there	adequate	e aisle	space
•	for	^ unobs	tructed	movemen	nt?

X			
-3/7/	 	<del></del>	

# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

(A)		s the Contingency Plan contain the lowing information:	Yes	No	NI*	Remarks		
	1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs						.*
	-	only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)	<u>×</u>				\	·
	2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?	<u>X</u>					
	3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?	X		·			
	4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?	<i></i>					
	5.	An evacuation plan for facility personnel where there is a possibilithat evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)	ty			,		

### V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

		Yes	No	NI*	Remarks
(B)	Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u> .	Market and the second		
(C)	Emergency Coordinator				
	l. Is the facility Emergency Coordinator identified?	X.	-managementers con		
	2. Is coordinator familiar with all aspects of site operation and emergency procedures?	×		- Company	
	3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	×		ченичний	
(D)	Emergency Procedures				
	If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?			$\times$	
	VI. MANIFEST SYSTEM, RE (Part 26)	ECORDKE 5 Subpa	EPING	, AND F	REPORTING
		Yes	No	NI*	Remarks
(A)	Use of Manifest System				
	l. Does the facility follow the procedures listed in §265.71 for processing each manifest?	X	minimize	•••••	Chem Met, Wyandot, I'm
	2. Are records of past shipments retained for 3 years?	- TOWN TOWN	-	mings/scorregy	
(B)	Does the owner or operator meet requirements regarding manifest discrepancies?	$\nearrow$	Advilli-durens	enorth annuage	

VI. RECORDKEEPING - Contin	/l. K	ECORDKEEPING	-	Contin	)
----------------------------	-------	--------------	---	--------	---

(C) Operating Record	rd	eco	R	ng	i	at	per	0	(C)	
----------------------	----	-----	---	----	---	----	-----	---	-----	--

- 1. Does the owner or operator maintain an operating record as required in 265.73?
- 2. Does the operating record contain the following information:
  - \*\*b. The method(s) and date(s)
     of each waste's treatment,
     storage, or disposal as
     required in Appendix I?
    - c. The location and quantity of each hazardous waste within the facility?
- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)
  - e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?
  - f. Reports detailing all incidents that required implementation of the Contingency Plan?
  - g. All closure and post closure costs as applicable? (Effective 5-19-81)

$\sqrt{}$		
/>	 <del></del> '.	

$\checkmark$		
<del>√`</del>	 <del></del> .	

$\checkmark$		

4/A \_\_\_\_

<del>×</del> - - -

<sup>\*\*</sup> See page 33252 of the May 19, 1980, Federal Register.

<sup>\*\*\*</sup> Only applies to disposal facilities

# VII. CLOSURE AND POST CLOSURE (Part 265 Subpart G)

		•	Yes	No	NI*	Remarks
(A)	Clo	sure and Post Closure				
	l.	Is the facility closure - plan available for inspection by May 19, 1981?	X	·		
	2.	Has this plan been submitted to the Regional Administrator	- Agrooms	$\times$	<b>3</b> 4410	,
	3.	Has closure begun?	***************************************	X	-,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
	4.	Is closure estimate available by May 19, 1981?	$\underline{\times}$	-	· ·	
(B)	Pos	t closure care and use of property				
	a p	the owner or operator supplied post closure monitoring plan? fective by May 19, 1981)		,	<u>N/A_</u>	
		VIII. FAC (Part 265, S	ubpart I	s I t	hru R)	
Saci	11+4	use and manager Name: Boden				
Q G I	iicy	R	Yes		te of I NI*	nspection: $8-26-8/$ Remarks
	7.	Are containers in good condition?	$\stackrel{\times}{\sim}$	-	-	
	2.	Are containers compatible with waste in them?	X	***************************************	***	
	3.	Are containers stored closed?	X	<u> </u>	THE PARTY OF THE P	
. •	4.	Are containers managed to prevent leaks?	X	***************************************		
	5.	Are containers inspected weekly for leaks and defects?	X	-	•	
	6.	Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	X	vocurinump	Ашимафічен	

	7.	Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)				<del></del>			
·	8.	Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?				******************************			
		: • <b>τ</b> .	J ANKS						:
Faci	lity	Name:		Date	of In	spection			
	1.	Are tanks used to store only those wastes which will not cause corrosio leakage or premature failure of the tank?	n,						
	2.	Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other contain ment structures?			***			\ *******	
	3.	Do continuous feed systems have a waste-feed cutoff?		·		<del></del>	<del></del>		) to to to to to to to to
	4.	Are waste analyses done before the tanks are used to store a substantially different waste than before?	***			•••••		, 	:
	5.	Are required daily and weekly inspections done?	***		41-4-41				) 
	6.	Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	-		4040-40			~~~	
	7.	Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)			***				
	• •							<del></del>	

Yes No NI+ Remarks

### Yes No NI\* Remarks

· 8.	Has the owner or operator observed the Association's buffer zone requirements or reactive wastes?	ne National Fire Protection s for tanks containing ignitable
	Tank capacity:	gallons
	Tank diameter:	feet
	Distance of tank from property line	feet
	(See table 2 - 1 through 2 - 6 of NFF Code - 1977" to determine compliance	PA's "Flammable and Combustible Liquids
	K SURFACE IMP	POUNDMENTS
Facility	Name:	Date of Inspection:
1.	Do surface impoundments have at least 60 cm (2 feet) of freeboard?	
2.	Do earthen dikes have protective covers?	
3.	Are waste analyses done when the impoundment is used to store a substantially different waste than before?	
4.	Is the freeboard level inspected at least daily?	
5.	Are the dikes inspected weekly for evidence of leaks or deterioration?	
6.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	
7.	Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)	
	•	·····································

### WASTE PILES

acility	Name:		<del></del>	Date of	Inspection:
		Yes	No	NI*	Remarks
1.	Are waste piles covered or protected from dispersal by wind?			<del>p tu</del>	
2.	Is each in-coming movement of waste analyzed before being added to the waste pile?				
3.	Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	***		***	***
4.	Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
5.	Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?			****	
6.	Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)				
7.	Are piles of imcompatible waste protected by barriers or distance from other waste?				

### LAND TREATMENT

Facility	Name:	<b>€</b>	Date	of Ins	pection:
1.	Is treated hazardous waste capable of biological or chemical degradation?	భా భా భా	₩₩₩	400 400 400	
2.	Are run-off and run-on diverted from the facility or collected? (Effective date: November 19, 1981)?				
3.	Is waste analyzed according to 265.273?				
4.	If food chain crops are grown at the facility, has the owner or operator addressed the requirements of 265.276?				
5.	Is an unsaturated zone monitoring plan designed and implemented to detect the vertical migration of hazardous waste and provide information on the background concentrations of the hazardous waste available?				
6.	Does the unsaturated zone monitoring plan address the minimum information specified in 265.278?				<u> </u>
7.	Are records kept regarding application dates and rates, quantities, and locations, of all hazardous wast placed in the facility?	e			
8.	Are the special requirements fulfilled regarding land treatment of ignitable or reactive wastes? (Indicate if waste is ignitable or reactive.)	· ************************************	₩	₩₩ <b>₽</b>	***************************************
9.	Are incompatible wastes land treated? (If yes, 265.17(b) applies)		Secretary and the secretary an	<b>⇔</b> ₩ <b>⇔</b>	\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$\$\tau\$
	· · · · · · · · · · · · · · · · · · ·				· · · · · · · · · · · · · · · · · · ·

#### N LANDFILLS

Fac	:ility	Name:	υđ	ce o	1 11125		1 411.
			Yes	No	NI*	<b>k</b>	Remarks
(A)	Gener Does	al Operating Requirements the facility provide the following:					
·	**1.	Diversion of run-on away from active portions of the fill?			, <del></del>	-	
	**2.	Collection of run-off from active portions of the fill?		***	. <del></del>		****
\$	**3.	Is collected run off treated?			. v-		
	4.	Control of wind dispersal of hazardous waste?					****
		(**Effective 11-19-81)		,			
(B)	Surv Does	eying and Recordkeeping the Operating Record Include:		. •			•
	1.	A map showing the exact location and dimensions of each cell?		, <u>.</u>	, <del>-</del>		
	2.	The contents of each cell and the location of each hazardous waste type withing each cell?	•••		- <del>-</del>		
		L D. at. Clasums	•				
(C)	Clo:	sure and Post-Closure				•	
	1.	Is the Closure Plan available for inspection by 5-19-81?	•				************
	2.	Has this plan been submitted to the Regional Administrator?					
•	3.	Has closure begun?			, was	-,	
	4.	Is closure cost estimate available by 5-19-81?		•	<del></del>		
(0	) Spe	ecial requirements for ignitable or active waste				٠	· · · · · · · · · · · · · · · · · · ·
	+ ~	e ignitable or reactive waste eated so the resulting mixture no longer ignitable or reactive?			<del>-</del>		
		· · · · · · · · · · · · · · · · · · ·					

		Yes	No	NI*	Remarks
	(If waste is rendered non-reactive or non-ignitable see treatment requirements)			;	
	If not, the provisions of 40 CFR 265.17(b) apply.	<del></del>	*WARRACTORNA	CEXTAGNISHED COMP	
E)	Special Requirements for Incompatible Wastes.				
	Does the owner or operator dispose of incompatible wastes in separate cells?	-	40000000	**************************************	
	If not, the provisions of 40 CFR 265.17(b) apply.			***************************************	
F)	Special requirements for liquid waste (effective 11-19-81)		٠		
	1. Are bulk or non-containerized liquids placed in the landfill?		**************************************		
	2. Does the landfill have a chemically and physically resistant liner system?		MENTAL PROPERTY AND		
	3. Does the landfill have a functional leachate collection system?		مستحدد المتحدد	exemply operated	
	4. Are free liquids stabilized prior to or immediately after placement in the landfill?		ann and a second	<del>Washinggaga</del>	
G)	Special requirements for Containers (effective 11-19-81)				
	Are empty containers crushed flat, shredded, or similarly reduced in volume before being buried beneath the surface of the landfill?	ران میساند. میرون میساند		utaninananinin sikatananan	

# O and P INCINERATION and THERMAL TREATMENT

(A)	Facility Name:					
(B)	Date of Inspection:					· · · · · · · · · · · · · · · · · · ·
		•			٠,	
	I. Det	erminatio	on of	Stea	dy State	<u>1</u>
Α.	Type of unit (i.e., type of incin	erator oi	r the	ermal	treatmer	nt):
В.	Components and steady state condi	tion:				·
		****	Was	this	componer	nt at SS prior to adding waste?
	Component		Yes	No	NI÷	Remarks
7						
1. 2.						
3.						
4.	:			-		·
5.						
		II. Was	te A	nalys	<u>is</u>	
Α.	Minimum requirements, for wastes	not prev	ious	ly bu	rned/tre	ated.
	1. Required analyses; has a analysis been performed for the following?	an	Yes	No	NI*	Remarks
	a. Heating value				. <del>_</del>	
	b. Halogen content			<u> </u>		
	c. Sulfur content			- —	- <del> </del>	

2. Has documented or written data been substituted for analysis of either:  a. Lead?  b. Mercury?  List other parameters for which the waste is tested to enable owner or operator to esta steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)  Remarks  1.  2.  3.  4.  5.  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equipment inspected daily for leaks, spills,		, · · · · · · · · · · · · · · · · · · ·	Yes No	o NI*	Rem ks .	
b. Mercury?  List other parameters for which the waste is tested to enable owner or operator to esta steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)  Remarks  I.  2.  3.  4.  5.  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip—	been subst	tituted for analysis		•		·
List other parameters for which the waste is tested to enable owner or operator to esta steady state or determine the types of pollutants which may be emitted. (Note in Remarks any which you feel should be tested.)  Remarks  Remarks  I.  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	a. Lead?		· · · · · · · · · · · · · · · · · · ·			· · · · · · · · · · · · · · · · · · ·
Remarks any which you feel should be tested.)  Remarks  Remarks  Remarks  Remarks  Remarks  Remarks  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip—	b. Mercu	ry?				
2.  3.  4.  5.  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	steady state or det	termine the types of	f pollutants	ed to enab which may	y be emitted. (Note	to establi in
3.  4.  5.  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	1.			•		,
4.  5.  III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume dif- ferent than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	2 .					
III. Monitoring and Inspections  Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume dif- ferent than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	3.		·			
Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume dif- ferent than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	4.	· · · · · · · · · · · · · · · · · · ·		•		termina and the second
Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume dif- ferent than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-	5.					
Yes No NI* Remarks  Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume dif- ferent than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-					ecopie sistema manazari (glista communicati part de de communicati part glista di menuni	
Are combustion/emission control instruments monitored at least every 15 minutes?  Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume dif- ferent than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-		III. Monito	oring and I	<u>ispections</u>		
Is steady state maintained or corrections attempted?  Is stack plume observed at least hourly for normal color and opacity?  Did any stack observations made by owner or operator show a plume different than normal?**  If yes to D above, were corrections made to return emissions to normal appearance?**  Are the complete unit and associated equip-		,	Yes No	*IN c	Remarks	
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Are emergency shutdown controls and system alarms checked daily for proper operation?	for normal color and provided any stack observations of the complete under the complete under the complete under the complete under the complete daily of the color of the col	nd opacity?  rvations made by show a plume dif- ?**  were corrections ssions to normal  nit and associated of the state of		Secretary Company		

<sup>\*</sup>Not Inspected r\*Spraify in Remarks for what period of time this was checked.

### iv. Open Burning

Α.	Only	complete	this	part	if	the	facility	open	burns	hazardous	waste.
----	------	----------	------	------	----	-----	----------	------	-------	-----------	--------

		Yes	No	NI*	Remarks	
1.	Does this facility burn only waste explosives? (A No answer means other hazardous waste is open-burned.)	- '				
2.	If this facility open- burns waste explosives, does it burn the waste at a distance greater than or equal to the minimum specified distance (below)			·		

Pounds of waste explosives or propellants	Minimum distance from open burning or detonation to the property of others
0 to 100 101 to 1,000 1,001 to 10,000 10,0001 to 30,000	380 m 1,250 ft 530 m 1,730 ft

O

### CHEMICAL, PHYSICAL and BIOLOGICAL TREATMENT

Faci	ility Name:		-			
Date	e of Inspection:		_			
		Yes No	NI*	Remarks		
	Is equipment used to treat only those wastes which will not cause leakage, corrosion, or premature failure?				7	_
2.	Is a continuously fed system equipped with a means of hazardous waste inflow stoppage or control (e.g., cut-off system?)					_

2					Remarks
	as the owner or operator addressed he waste analysis requirements of 65.402?				
4. A a	re inspection procedures followed coording to 265.403?			- 400 ton	
5. A f	re the special requirements fulfilled or ignitable or reactive wastes?		•		
6. A	re incompatible wastes treated? (If es, 265.17(b) applies.)	Permission	**************************************		
	wastewater treatment tanks that recein hazardous waste or that generate, storis a hazardous waste where such wastewall or 307(b) of the Clean Water Act tanks, transport vehicles, vessels, or hazardous only because they exhibit the or are listed as hazardous wastes in the complete this section if the owner or hazardous waste that is subsequently statistics.	waters (33 U. r cont he cor Subpar	sare S.C. ainer rosiv	a wast subject 1251 et s which ity cha f 40 CF	ewater treatment sludge which to regulation under Sections seq.) and (2) neutralization neutralize wastes which are racteristic under 40 CFR §261.2 R Part 261 only for this reason
	1. MANIFES	ST REQ	UIREM	ENTS	
		ST REQ	UIREM No	ENTS NI*	Remarks
	1. MANIFES Does the operator have copies of the manifest available for review?				Remarks
(B) [ (C) (B) (B) (B) (B) (B) (B) (B) (B) (B) (B	Does the operator have copies of the manifest available for				Remarks
(B) [ (C) (B) (B) (B) (B) (B) (B) (B) (B) (B) (B	Does the operator have copies of the manifest available for review?  Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain				Remarks

Yes

No

NI\*

Remarks

 $\underline{\text{Omit}}$  Section 3 if the facility has interim status and its Part A permit application describes  $\underline{\text{storage}}$ 

### 3. On Site Accumulation

		Yes	No	NI*	Remarks
۱.	Are containers marked with start of accumulation date?		all-wideling appropriate		
2.	Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?				
3.	Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?		····		
4.	If wastes are stored in tanks, are the tanks managed according to the following requirements?				
	a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?		·		
***	b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?	· ·	ELECTRICAL PROPERTY.		
	c. Do continuous feed systems have a waste-feed cutoff?		especialists.	***************************************	•
	d. Are required daily and weekly inspections done?				
	e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?				
	f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)				•

# VI. RECORDKEEPING and REPORTING (Part 262, Subpart D)

•				Yes	No	NI*	Remarks	•
(A)	Exce	eptic	fests, Annual Reports, on Reports, and all test and analyses retained for three years?	<u> </u>				
(B)	Annu	ial F	generator submitted Reports and Exception as required?	X				
			VII. INTER	NATION	AL SHI	PMENTS		
			(Part 26	2, Su	bpart	E)	•	
			installation imported rted Hazardous Waste?					v :
	1.		(If answered Yes, complete the orting Hazardous waste, a generator:	follo	wing a	s appli	cable.)	
		a.	Notified the Administrator in writing?		. —			
		b.	Obtained the signature of the foreign consignee confirming delivery of the waste(s) in th foreign country?	e 				
		c.	Met the Manifest requirements?		-		+	
	2.		orting Hazardous Waste, the generator:					
		* 2	Met the manifest requirements?	·	- —			

#### X TRANSPORTER REQUIREMENTS 40 CFR Part 263

Complete this Section if the owner or operator transports hazardous waste.

## I. MANIFEST SYSTEM AND RECORDKEEPING (Subpart B)

		, -	Yes	No-	NI*	Remarks
	Are copies of the completed manifests or shipping paper(s) available for review and retained for three years?				<del></del>	
	II.	INTERNA	TTOTNA	ו כטזר	MENTE	
			LIUINA	r Suit	INE IA 12	
Α.	Does the transporter record on the manifest the date the waste left U.S.?	he the				
В.	Are signed completed manifest(s) on file?		entreference 2	-tk:=24449		
		V. MIS	SCELLA	NEOUS		
Ą٠ <u>.</u>	Does transporter transport hazardous waste into the U.S. from abroad?					
3.	Does the transporter mix hazardous waste of different DOT shipping descriptions by placing them into a single container?			and the second	water control of the	

NOTE: If (A) or (B) were answered "Yes" then the Transporter is also a Generator and must comply with the Generator regulations.

\*Not Inspected

#### REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Borden Chemical Printing Ink July 15, 1981 Page three

I recognize that this information is repetitious for many; however, it is included here for those who are  $\underline{not}$  familiar with these regulations and the subsequent Amendments.

As mentioned earlier, the Ohio EPA is conducting inspections of those facilities engaged in the generation, transportation, storage, or disposal of hazardous waste. Your company has identified itself as a TSDF. Therefore, an inspection has been tentatively scheduled sometime during the next two months. You will be contacted by telephone approximately a week prior to the inspection to arrange a definite meeting date.

For your benefit, I suggest you ensure your facility is in compliance with the applicable portions of these regulations as non-compliance will result in a notice of violation and a possible fine.

Sincerely,

Thomas K. Wray

Hazardous Waste Scientist

Thomas li. worms

TKW:sd

forthing forward to meeting with you there.

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A. Is this fecility a public	ly owned treatment works		.,			y feither existing or proposed) I entrol foeding operation or			
which results in a desch (FORM 2A)	arge to waters of the U.S.?		x			tion facility which results in a		x	
C. is this a facility which o	surrently results to discharges	15	1.7	1\$	D. Is this a proposed facili	ity (other than those described	19	20	- 3
to waters of the U.S. or A or B above? (FORM 20	ther than those described in	. 22	X	2.4	In A or B above) which waters at the U.S.7 (FC)	th will result in a discharge to PAM 2D)	23	X 2.5	2
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	OF HAZARDOUS	

- A. EPA HAZARDOUS WASTE NUMBER Enter the four digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four—digit number/s/ from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.
- B. ESTIMATED ANNUAL QUANTITY For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste/s/ that will be handled which possess that characteristic or contaminant.
- C. UNIT OF MEASURE For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE CODE	METRIC UNIT OF MEASURE CODE
POUNDSP	KILOGRAMS
TONS	METRIC TONS

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

#### D. PROCESSES

- 1. PROCESS CODES:
  - For listed hexardous waste: For each listed hazardous waste entered in column A select the code/s/ from the list of process codes contained in Item III to indicate how the waste will be stored, treated, end/or disposed of at the facility.
  - For non-listed hazardous wastes: For each characteristic or toxic contaminant entered in column A, select the code/s/ from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.
  - Note: Four spaces are provided for entering process codes, if more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-E(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).
- 2. PROCESS DESCRIPTION: If a code is not listed for a process that will be used, describe the process in the space provided on the form.

NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

- 1. Select one of the EFA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B.C. and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
- 2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
- 3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below) — A facility will treat and dispose of an estimated 900 pound; per year of chrorus shavings from leather tanning and finishing operation, in addition, the facility will treat and dispose of three non-listed wastes are corresive only and there will be an estimated 200 pounds per year of each visite. The other waste is corresive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

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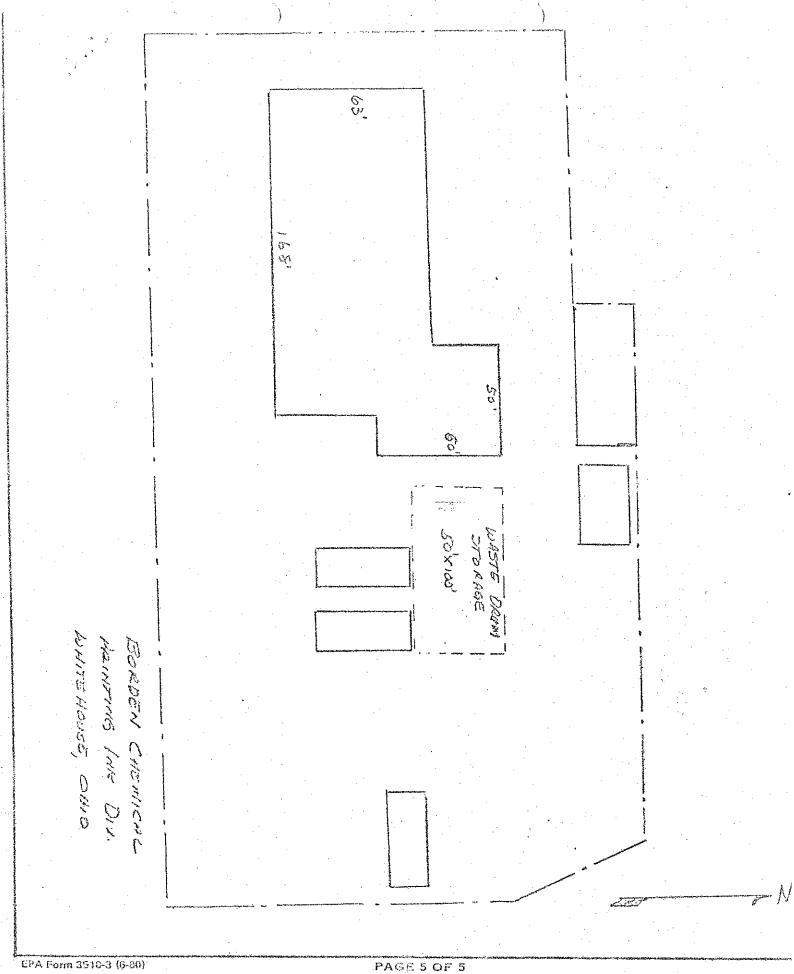
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EPA LD. NO. (enter from page 1)  I O H D O O S O 4 3 7 4 0 6  V. FACILITY DRAWING  All existing facilities must include in the space provided on page VI. PHOTOC 2 A PMS	p 5 a scale drawing of the facility (see instruction)	
V1. PHOTOGRAPHS  All existing facilities must include photographs (aerial a treatment and disposal areas; and sites of future storage VII. PACILITY GEOGRAPHIC LOCATION  LATITUDE (degrees, minutes, as seconds)	or ground—level) that clearly delineate all exite, treatment or disposal areas (see instruction	sting structures; existing storage, s for more detail).
4 1 3 1 0 5 0  VIII. FACILITY OWNER > 35 00 00 00 00 00 00 00 00 00 00 00 00 00	08	The state of the s
A. If the facility owner is also the facility operator as liste skip to Section IX below.  B. If the facility owner is not the facility operator as liste  1. NAME OF PACILITS	d in Section VIII on Form 1, complete the following	
E Borden Inc		614-225-42
F 180 E Broad St.	G Columbus	5. ST. 6. ZIF CODE
IX. OWNER CERTIFICATION  I certify under penalty of law that I have personally exdocuments, and that based on my inquiry of those indisubmitted information is true, accurate, and complete, including the possibility of fine and imprisonment.  A. NAME (print or type)	I am aware that there are significant penaltie	submitted in this and all attached the information, I believe that the s for submitting false information,
Robert W. Guthen, President Borden Chamical	SIGNATURE /	C. DATE SIGNED
X. OPERATOR CERTIFICATION	Michiel Hiller	1 11/17/80
I certify under penalty of law that I have personally exdocuments, and that based on my inquiry of those indisubmitted information is true, accurate, and complete, including the possibility of fine and imprisonment.	amined and am familiar with the information viduals immediately responsible for obtaining I am aware that there are significant penaltie	submitted in this and all attached to the information, I believe that the s for submitting false information,
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EPA Form 3510-3 (6-20)	performance of the state of the	
	PAGE 4 OF 5	CONTINUE ON PA

USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(I) ON PAGE 3.



## SWMU 4 Former Lead Contaminated Soils Area

The Former Lead Contaminated Soils Area was discovered during the 1988 OEPA complaint investigation, when investigators noted a small area of discolored soil. Samples were taken and the soil was found to contain high levels of lead. OEPA requested that Borden clean up the area. Borden had 272 yds.<sup>3</sup> of lead contaminated soil excavated to a depth of 1 foot and continued in an outward radius until lead levels were less than 5 ppm. All of the excavated soils were disposed of off-site. A natural 5 foot clay layer underlies the area 12 feet bgs and is of low permeability. The clay forms a low permeability layer of protection against possible contaminant migration into the deep aquifer. In order to receive a No Further Action designation from the state for this SWMU, it is necessary to perform a limited subsurface sampling event of the subsurface soils and the shallow groundwater. Samples would be taken in strategic areas at the site in order for overlapping to occur with other areas of the site that will need to be sampled as well.

# **AOC 1 Former Underground Fuel Tank Area**

Two underground storage tanks, 1,000 and 6,000 gallons, were used for fuel oil storage in this area. In 1991, these tanks were removed and were found to have several small holes. The surrounding soils were found to have high levels of TPH. Thirty (30) yds.<sup>3</sup> were excavated and disposed of off-site. The soil was excavated until all of the surrounding soils were at a TPH level of 20 ppm or less. With respect to the underlying clay layer, contaminant migration to the deep aquifer is unlikely. In order to receive a No Further Action designation from the state for this AOC, it is necessary to perform a limited subsurface sampling event of the subsurface soils and the shallow groundwater. Samples would be taken in strategic areas at the site in order for overlapping to occur with other areas of the site that will need to be sampled as well.

### Metal Storage Sheds

The OEPA conducted a site visit in 1993, and found some unlabeled drums containing liquid in these two areas. OEPA indicated that unless the contents of the containers can be proven to be non-hazardous, confirmatory subsurface testing will need to be completed in order for the area to receive a No Further Action Status. Samples would be taken in strategic areas at the site in order for overlapping to occur with other areas of the site that will need to be sampled as well.



#### **Conclusions**

We have reviewed all of the information on the site to date. Based on this information, we have determined that:

- 1. EPA has closed SWMU 1 and therefore a No Further Action determination should be granted by the OEPA.
- 2. A 1992 PA/VSI for SWMU 2 determined that potential sources have been removed, therefore a No Further Action determination should be granted by the OEPA.
- 3. Strategic subsurface samples need to be taken in order to confirm that contaminant migration into the soils and shallow groundwater has not occurred at SWMUs 3 and 4, AOC 1 and at the location of the metal storage sheds.

Thank you for taking time to review the attached information and to consider this request to be the lead agency for this case. We look forward to working with the OEPA to bring this site to closure. We would be happy to meet with you to discuss the site in greater detail. If you have any questions please feel free to contact me at  $(303)771-9200 \times 107$ . We look forward to your response.

Sincerely

Michael Bertrand

cc: George Hamper Region V EPA w/attachments Gerald Phillips Region V EPA w/attachments

#### DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

# RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

### **Current Human Exposures Under Control**

Facility Name:	Borden Chemical (Printing Ink)
Facility Address:	no longer in existence
Facility EPA ID #:	0HD005043740
groundwater, s	le relevant/significant information on known and reasonably suspected releases to soil, surface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Inits (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in nation?
Υ.	If yes - check here and continue with #2 below.
	If no - re-evaluate existing data, or
	if data are not available skip to #6 and enter"IN" (more information needed) status code.

## **BACKGROUND**

#### **Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

#### **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air media known or reasonably suspected to be "contaminated" above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

	Yes	<u>No</u>	?	Rationale / Key Contaminants
Groundwater		N		·
Air (indoors) <sup>2</sup>		N		
Surface Soil (e.g., <2 ft)		N		
Surface Water		N		
Sediment		N		
Subsurf. Soil (e.g., >2 ft)	Y			1992 PA/VSI report
Air (outdoors)		N		

If no (for all media) - skip to #6, and enter "YE," status code after providing or citing
 appropriate "levels," and referencing sufficient supporting documentation demonstrating
that these "levels" are not exceeded.

V	If yes (for any media) - continue after identifying key contaminants in each	
Y	"contaminated" medium, citing appropriate "levels" (or provide an explanation for	or the
	determination that the medium could pose an unacceptable risk), and referencing	
	supporting documentation.	

\_\_\_\_ If unknown (for any media) - skip to #6 and enter "IN" status code.

#### Rationale and Reference(s):

Presently a private residence exists on the property per Allen Debus' May 16, 2002 memo to Hak Cho. This property is no longer commercially zoned and was decommissioned in the late 1990s following 1999 sampling conducted to certify closure with the OEPA. A 2/15/00 letter from a site that sampled & remediated the facility indicates 'no remaining environmental issues.' The 1992 PA/VSI report indicates contaminated soil was excavated & removed.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

Potential **Human Receptors** (Under Current Conditions)

<sup>&</sup>lt;sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>&</sup>lt;sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks

	ntaminated" Media undwater	<u>Residents</u>	Workers	Day-Care	Construction T	respassers	Recreation	Food <sup>3</sup>
Air	(indoors)	( <del>)</del>	<del>Sontani</del>	() <del>(=======</del> 0).	(			5 <del></del>
	(surface, e.g., <2 ft)	A <del>rt Contact</del>	(100000)					
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	(subsurface e.g., >2	ft)	<del></del>		_N		-	
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7 111	(outdoors)	A		(A <del>rt - 10.1</del> 1)	(A			
	Instructions for Su	ımmary Exposur	e Pathway	Evaluation '	<u>Γable</u> :			
		out specific Me			deceptors' spaces	s for Media v	which are not	
		'yes" or "no" for combination (Pa		'completene	ss" under each "	Contaminate	ed" Media H	Iuman
	Note: In order to f Media - Human R combinations may added as necessary	eceptor combina not be probable	tions (Path	ways) do no	t have check spa	aces ("").	While these	
		skip to #6, and e in-place, whethe	nter "YE" r natural or ed medium	status code, man-made,	y contaminated after explaining preventing a continuous ptional Pathway	and/or refer mplete expos	encing conditi sure pathway f	on(s) from
					'Contaminated'' is supporting exp		nan Receptor	3
39		If unknown (for and enter "IN" s			ledia - Human R	leceptor com	bination) - ski	p to #6
Ration	ale and Reference(s)	:						
Proper	ty is privately owned	l & chances for 1	najor subsu	ırface const	ruction remain u	nlikely.		
4.	Can the exposures "significant" (i.e.	s from any of the ., potentially "un	e complete pacceptable	pathways id " because e	entified in #3 be xposures can be	reasonably oreasonably e	expected to be	1)
<u> </u>								

<sup>&</sup>lt;sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

<sup>&</sup>lt;sup>4</sup> If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and experience.

greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

·	If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
	If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
-	If unknown (for any complete pathway) - skip to #6 and enter "IN" status code
Rationale and Re	eference(s):

5.	Can the "signific	ant" exposures (identified in #4) be shown to be within acceptable limits?
		If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing <u>and</u> referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).
	5	If no (there are current exposures that can be reasonably expected to be "unacceptable")-continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.
		If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code
	Rationale and Re	eference(s):

6.

Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code

<u>Y</u>	YE - Yes, "Current Human Exposures Under review of the information contained in this EI Exposures" are expected to be "Under Contro Chemical facility, EPA ID # 0HD 005 04 Whitehouse, OH under current and reasonably will be re-evaluated when the Agency/State befacility.	Determination, 'ol" at the _(forme is 740 formerly low expected conditions.	"Current Human rr)Borden ocated at 6725 Gilead tions. This determina
 _IN	NO - "Current Human Exposures" are NOT  IN - More information is needed to make a		,,
	IN - More information is needed to make a	determination.	August 1,
	IN - More information is needed to make a (signature)	determination.	

(EPA Region or State)

Locations where References may be found: 7th Floor Archive at 77 West Jackson Blvd. Chicago, IL

#### Note:

There wasn't much information available on the former Borden Chemical Printing Ink Division facility, which was situated in Whitehouse, Ohio, and so I supplemented the U.S. EPA's single file of documents through a series of phone calls and informational requests. This note shall document those communications. The PA/VSI was completed on June 17, 1992. Borden's 5-acre facility became inactive in 1985, shortly after its Drum Storage Pad closure was certified-approved by the U.S. EPA (in 1984).

Although Borden had been used as a dairy between the 1930s through 1950s, between 1961 and 1982 it operated as a manufacturing center, producing lead and solvent-based printing inks. A decade ago, authors of the PA/VSI report recommended further action (i.e. groundwater sampling and analysis for VOCs) for the vicinity of an area formerly occupied by underground fuel tanks. Two underground tanks (1,000 gallons & 6,000 gallon capacities) had been removed from the location in 1991. Total Petroleum Hydrocarbons (TPH) contamination was noted, leading to excavation and offsite disposal of petroleum-contaminated (4,000 ppm) soil. Following remediation, residual TPH levels were < 20 ppm.

Borden also managed a former underground tank farm, from which chemical releases (i.e. VOCs) occurred. The 1992 PA/VSI report states "...significant levels of VOCs were detected in groundwater samples. Nothing has been done to remediate this groundwater contamination. An (8 foot thick) clay layer appears to underlie the area at a depth of about 12 feet preventing downward migration to the primary water-bearing aquifer... Though no soil samples were taken, subsurface soil is probably contaminated because there is groundwater contamination. Surface soil should be free of contamination because the release occurred underground."

The PA/VSI also described an area contaminated with lead, from which 272 cubic yards of soils contaminated with up to 110 ppm lead were removed in 1988. Authors of the 1992 PA/VSI report concluded that groundwater should be sampled for metals and VOCs in the vicinity of the lead-contamination zone.

Because the U.S. EPA's file information ended with the 1992 PA/VSI report, it was not possible to decipher what had happened at the facility since 1992 without making a series of phone calls. But, following a chain of telephone calls, I gleaned the following. Admittedly, some of this information is rather 'sketchy.'

In late 1997, OEPA had been notified of the sale of the former Borden facility involving (or possibly sold to) a firm named Cherokee Environmental Risk Mgt., based in Englewood, CO. Cherokee performed additional sampling in 1999 to 'complete a certified closure.' Then, the property was resold, following demolition of onsite building structures (by a firm known as 'ERMC'). Evidently, following the closure-related sampling, a Feb. 15, 2000 Cherokee letter explains how there were, 'no remaining environmental issues.' Repeated phone requests to Cherokee scored no success in obtaining these documents or other information bearing on recent Borden site history. From the OEPA-NW District Office's archives, however, I was able to obtain a copy of a 7/8/98 letter from Cherokee addressed to OEPA. Therein, after summarizing results of the PA/VSI and requesting a 'no further action determination' from OEPA, Cherokee stated that "Strategic subsurface samples need to be taken in order to confirm that contaminant migration into the soils and shallow groundwater has not occurred...." A data summary report contained in the PA/VSI report shows that groundwater contaminant levels were less than MCLs in 1986.

Prior to uncovering further details on the chain of events leading to property sales, I contacted the Lucas County Recorder office, from whom I obtained the name of the current property owner for the 6725 Gilead address, which is also the former facility street address as noted on Borden's Part A application. I was informed that this address is now a residential property owned by Daniel J. and Leslie A. White. Given that the former Borden facility is evidently no longer commercially owned or operated, and is now zoned as a family residence, this would be a poor choice for a VCAA. The site no longer meets our definition of commercial facility. Presently, based on my interpretation of available records, there is little reason to suspect that hazardous constituent contamination exists in surface soils above levels of concern to human health.

#### Contact telephone and e-mail numbers

(name)	Allen Debus	
(phone #)	312-886-6186	
(e-mail)	debus.allen@epamail.epa.gov	

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.

#### DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

# RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

#### Migration of Contaminated Groundwater Under Control

Facility Name:	Borden Chemical (Printing Ink)
Facility Address:	no longer in existence
Facility EPA ID #:	0HD005043740
groundwater med	relevant/significant information on known and reasonably suspected releases to the lia, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units ated Units (RU), and Areas of Concern (AOC)), been <b>considered</b> in this EI determination?
<u>Y</u>	If yes - check here and continue with #2 below.
	If no - re-evaluate existing data, or
	if data are not available skip to #6 and enter "IN" (more information needed) status code.
BACKGROUND	

# Definition of Environmental Indicators (for the RCRA Corrective Action)

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### <u>Definition of "Migration of Contaminated Groundwater Under Control" EI</u>

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., non-aqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

## **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2.	"levels" (i.e., ap	known or reasonably suspected to be "contaminated" above appropriately protective plicable promulgated standards, as well as other appropriate standards, guidelines, teria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?
		If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
	N	If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."
	<del>,</del>	If unknown - skip to #8 and enter "IN" status code.

#### Rationale and Reference(s):

Data (Table 3) in the 1992 PA/VSI report indicates that VOCs and lead did not exceed levels of concern, (MCLs). Evidently in 1998, Cherokee Environmental Risk Mgt. sampled the property in order to certify closure. By 2000 Cherokee had established there were no remaining environmental issues. Also see CA-725 form for this facility (see note in 'Location were references may be found." p. 7).

<sup>&</sup>lt;sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

3.	Has the migration of contaminated groundwater stabilized (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater" as defined by the monitoring
	locations designated at the time of this determination)?
	If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination" <sup>2</sup> ).
	If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination" <sup>2</sup> ) - skip to #8 and enter "NO" status code, after providing an explanation.
	If unknown - skip to #8 and enter "IN" status code.
	Rationale and Reference(s):

<sup>&</sup>lt;sup>2</sup> "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

1.	Does "contam	inated" groundwater discharge into surface water bodies?
		_ If yes - continue after identifying potentially affected surface water bodies.
		If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing ar explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
		_ If unknown - skip to #8 and enter "IN" status code.
	Rationale and	Reference(s):

5.	Is the <b>discharge</b> of "contaminated" groundwater into surface water likely to be " <b>insignificant</b> " (i.e., the maximum concentration <sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?
	If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration <sup>3</sup> of <u>key</u> contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.
	If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration <sup>3</sup> of <u>each</u> contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations <sup>3</sup> greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.
	If unknown - enter "IN" status code in #8.
	Rationale and Reference(s):
6.	Can the <b>discharge</b> of "contaminated" groundwater into surface water be shown to be " <b>currently acceptable</b> " (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed
6.	

<sup>&</sup>lt;sup>3</sup> As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

to continue until a final remedy decision can be made and implemented<sup>4</sup>)?

	If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment, <sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interimassessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.
	If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.
	If unknown - skip to 8 and enter "IN" status code.
Rationale and Re	eference(s):

<sup>&</sup>lt;sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>&</sup>lt;sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

7.	necessary) be col	r monitoring / measurement data (and surface water/sediment/ecological data, as llected in the future to verify that contaminated groundwater has remained within the rtical, as necessary) dimensions of the "existing area of contaminated groundwater?"
		If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."
		If no - enter "NO" status code in #8.
		If unknown - enter "IN" status code in #8.
	Rationale and Re	eference(s):

EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

	verified. Based on a review of the information contain determination, it has been determined that the "Migran		
	Groundwater" is "Under Control" at the		
	facility , EPA ID #		, located
	indicates that the migration of "contaminated" ground that monitoring will be conducted to confirm that contremains within the "existing area of contaminated ground determination will be re-evaluated when the Agency significant changes at the facility.	water is u taminated undwater	l groundwater " This
W-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0-0	NO - Unacceptable migration of contaminated groun	dwater is	observed or exped
-	IN - More information is needed to make a determination	ation.	
Completed by	(signature)	Date	
	(print) Allen Debus		August 1, 2002
	(title) Chemist/Project Manager	•	
upervisor	(signature)	Date	
	(print)		·
	(title)		
	(EPA Region or State)		
	e References may be found: we room at 77 West Jackson Blvd., Chicago.		
ontact telephon	e and e-mail numbers		
(name)	Allen A. Debus		
(phone			
(e-mail			

#### DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

#### **RCRA** Corrective Action Environmental Indicator (EI) RCRIS code (CA750)

#### Migration of Contaminated Groundwater Under Control

Facility Name: Facility Address:		Borden Chemical (Printing Ink)
		no longer in existence
Facility	EPA ID#:	0HD005043740
1.	groundwater m	le relevant/significant information on known and reasonably suspected releases to the edia, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units ulated Units (RU), and Areas of Concern (AOC)), been <b>considered</b> in this EI determination?
Y		If yes - check here and continue with #2 below.
		If no - re-evaluate existing data, or
-		if data are not available skip to #6 and enter"IN" (more information needed) status code.
/ <u></u>		

#### **BACKGROUND**

#### **Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### Definition of "Migration of Contaminated Groundwater Under Control" EI

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., nonaqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

#### **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

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2.	Is <b>groundwater</b> known or reasonably suspected to be " <b>contaminated</b> " above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility
	If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.
N s <del>upp</del> ort	If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing ing documentation to demonstrate that groundwater is not "contaminated."
	If unknown - skip to #8 and enter "IN" status code.
	Rationale and Reference(s): 1992 PA/VSI Report for Borden Chemicals prepared for USEPA by PRC. (Table 3).

<sup>&</sup>lt;sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

Data (Table 3) in the 1992 PA/VSI report indicates that in 1986 several VOCs did exceed levels of concern. Evidently in 1998, Cherokee Environmental Risk Mgt. sampled the property in order to certify closure. By 2000 Cherokee had established there were no remaining environmental issues. During removal action in 1986, four borings were sampled from which boring # 3 was found to have several elevated VOCs, of which only two parameters exceeded MCL values (i.e. – TCE and PCE) at a 17 foot depth. Air stripping remediation attempts were made over the next two months to further reduce contaminants. In 1988, there were no VOCs detections in the 160 foot depth dolomite aguifer which is used locally as a drinking water source. A 'very tight layer of gray clay' underlies the area of the entire former site from 12 feet to 17 feet, although the clay layer probably extends to 20 feet below the ground surface. Dolomite bedrock lies immediately under the 5 to 8 foot clay layer. While groundwater in which shallow level contamination was detected 20 years ago is not considered a potable source, it is also most unlikely to represent a vertically migrating plume. While there is no current or recent groundwater data characterizing the contamination, its horizontal rate of migration is most likely negligible, especially since any contaminants remaining following site remediation efforts may have biodegraded during the past 20 years. 1986 Contaminant concentrations noted/(Region 9 PRG Value - 2002): Benzene -

1986 Contaminant concentrations noted/(Region 9 PRG Value - 2002): Benzene – 4.2 ug/L/(0.34 ug/L); TCE – 13 ug/L/(0.28 ug/L); PCE – 64 ug/L/(0.66 ug/L); Toluene – 330 ug/L/(72 ug/L); Ethylbenzene – 6.1 ug/L/(2.9 ug/L); m-dichlorobenzene – 9.7 ug/L/(5.5 ug/L); o + p – dichlorobenzene 36 ug/L/(370, 0.5 ug/L, for o & p isomers, respectively)

3.	expected to remain within "existing area of contaminated groundwater" as defined by the monitoring					
	locations designated at the time of this determination)?					
	If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination" <sup>2</sup> ).					
_	If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination". skip to #8 and enter "NO" status code, after providing an explanation.					
	If unknown - skip to #8 and enter "IN" status code.					
	Rationale and Reference(s):					

<sup>&</sup>lt;sup>2</sup> "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

4.	Does "contaminated" groundwater <b>discharge</b> into <b>surface water</b> bodies?
	If yes - continue after identifying potentially affected surface water bodies.
	If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
	If unknown - skip to #8 and enter "IN" status code.
	Rationale and Reference(s):

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5.	Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the
	maximum concentration <sup>3</sup> of each contaminant discharging into surface water is less than 10 times their
	appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of
	discharging contaminants, or environmental setting), which significantly increase the potential for
	unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of <u>key</u> contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of <u>each</u> contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

If unknown - enter "IN" status code in #8.

Rationale and Reference(s):

<sup>&</sup>lt;sup>3</sup> As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

6.	Can the <b>discharge</b> of "contaminated" groundwater into surface water be shown to be " <b>currently acceptable</b> " (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented <sup>4</sup> )?
	If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation

se ce ater, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR 2) providing or referencing an interim-assessment,<sup>5</sup> appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interimassessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

If unknown - skip to 8 and enter "IN" status code.

#### Rationale and Reference(s):

<sup>&</sup>lt;sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>&</sup>lt;sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7.	Will groundwater <b>monitoring</b> / measurement data (and surface water/sediment/ecological data, as
	necessary) be collected in the future to verify that contaminated groundwater has remained within the
	horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"
	If yes - continue after providing or citing documentation for planned activities or future
	sampling/measurement events. Specifically identify the well/measurement locations
	which will be tested in the future to verify the expectation (identified in #3) that
	groundwater contamination will not be migrating horizontally (or vertically, as necessary)
	beyond the "existing area of groundwater contamination."
	If no - enter "NO" status code in #8.
	If unknown - enter "IN" status code in #8.
	Rationale and Reference(s):

8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or

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appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

Y

YE - Yes, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the \_\_Former Borden chemicals facility, EPA ID # OHD005043740, formerly located at Whitehouse, OH. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be re-evaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed

or expected.

IN - More information is needed to make a determination.

Completed by	(signatur		Date	
	(print)	Allen Debus		May 22, 2006
	(title)	Chemist/Project Manager		

Supervisor	(signatur		Date	
	(print)			
	(title)			
	(EPA Reg State)	ion or		

Locations where References may be found:	
7 <sup>th</sup> floor archive room at 77 West Jackson Blvd., Chicago.	

Locations where References may be found:				

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#### DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION

Interim Final 2/5/99

# RCRA Corrective Action Environmental Indicator (EI) RCRIS code (CA725)

#### **Current Human Exposures Under Control**

racinty Name:	Borden Chemical (Printing Ink)			
Facility Address:	(Whitehouse, OH), no longer in existence; 6725 Gilead St.			
Facility EPA ID #:	0HD005043740			
groundwater, s	le relevant/significant information on known and reasonably suspected releases to soil, urface water/sediments, and air, subject to RCRA Corrective Action (e.g., from Solid Waste Inits (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in nation?			
Y	If yes - check here and continue with #2 below.			
· 	If no - re-evaluate existing data, or			
***************************************	if data are not available skip to #6 and enter 'TN' (more information needed) status code.			

## <u>BACKGROUND</u>

#### **Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

#### Definition of "Current Human Exposures Under Control" EI

A positive "Current Human Exposures Under Control" EI determination ("YE" status code) indicates that there are no "unacceptable" human exposures to "contamination" (i.e., contaminants in concentrations in excess of appropriate risk-based levels) that can be reasonably expected under current land- and groundwater-use conditions (for all "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

#### Relationship of EI to Final Remedies

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Current Human Exposures Under Control" EI are for reasonably expected human exposures under current land- and groundwater-use conditions ONLY, and do not consider potential future land- or groundwater-use conditions or ecological receptors. The RCRA Corrective Action program's overall mission to protect human health and the environment requires that Final remedies address these issues (i.e., potential future human exposure scenarios, future land and groundwater uses, and ecological receptors).

#### **Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

2. Are groundwater, soil, surface water, sediments, or air **media** known or reasonably suspected to be "**contaminated**" above appropriately protective risk-based "levels" (applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action (from SWMUs, RUs or AOCs)?

Yes	<u>No</u>	?		Rationale / Key Contaminants
	N			
	N			
	N			
	N			
	N			
Y				1992 PA/VSI report
	N			
		N N N N N	N N N N N N	N N N N N N

If no (for all media) - skip to #6, and enter "YE," status code after providing or citing
 appropriate "levels," and referencing sufficient supporting documentation demonstrating
that these "levels" are not exceeded.

<u>Y</u>	If yes (for any media) - continue after identifying key contaminants in each "contaminated" medium, citing appropriate "levels" (or provide an explanation for the
	determination that the medium could pose an unacceptable risk), and referencing supporting documentation.
	supporting documentation.

If unknown (for any media) - skip to #6 and enter "IN" status co	II unknowi	ı (Ior any	y media) -	- ѕкір і	O#0	and en	iter IIN	status co	ae
------------------------------------------------------------------	------------	------------	------------	----------	-----	--------	----------	-----------	----

Rationale and Reference(s):

Presently 2 private residences and a Dollar General store situated on a paved lot exist on the former property boundary. Two parcels of this property are no longer commercially zoned. The abandoned Borden site was decommissioned in the late 1990s following 1999 sampling conducted to certify closure with the OEPA. A 2/15/00 letter from Cherokee Environmental that sampled & remediated the facility indicated 'no remaining environmental issues.' The 1992 PA/VSI report indicates contaminated soil was excavated & removed. Also see note following Question no.6.

3. Are there **complete pathways** between "contamination" and human receptors such that exposures can be reasonably expected under the current (land- and groundwater-use) conditions?

Summary Exposure Pathway Evaluation Table

<sup>&</sup>lt;sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriately protective risk-based "levels" (for the media, that identify risks within the acceptable risk range).

<sup>&</sup>lt;sup>2</sup> Recent evidence (from the Colorado Dept. of Public Health and Environment, and others) suggest that unacceptable indoor air concentrations are more common in structures above groundwater with volatile contaminants than previously believed. This is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration necessary to be reasonably certain that indoor air (in structures located above (and adjacent to) groundwater with volatile contaminants) does not present unacceptable risks.

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# Potential <u>Human Receptors</u> (Under Current Conditions)

	taminated" Media	Residents N_	Workers N	Day-Care N	Construction N	n Trespassers	Recreation	Food <sup>3</sup>
	ndoors)	N	N	N	- · <del></del>			
	surface, e.g., <2 ft)	N	N	N	N	N	N	N
	ce Water	N	N	- · · · · · · · · · · · · · · · · · · ·	- · · · · · · · · · · · · · · · · · · ·	N	N	N
Sedin		N	N			N	N	N
	subsurface e.g., >2 ft)	* '	* \		_N	- \	^ \	N
	outdoors)	N	N	N	N	N		<b>*</b> *
	Instructions for Summ	nary Exposur	e Pathway 1	Evaluation 7	Table:			
		t specific Me ed" as identif			eceptors' spa	ces for Media v	which are not	
		s" or "no" for mbination (Pa		'completene	ss" under eac	h "Contaminate	ed" Media – H	Iuman
	Note: In order to focu Media - Human Rece combinations may no added as necessary.	ptor combina	tions (Path	ways) do no	t have check	spaces ("").	While these	
	skij in- <sub>l</sub> eac	p to #6, and e place, whethe	nter "YE" s r natural or ed medium	status code, man-made,	after explaini preventing a	ed media-recepting and/or referencemplete expose ay Evaluation V	encing conditi sure pathway f	on(s) from
					Contaminated supporting e	d" Media - Hun xplanation.	nan Receptor	
		ınknown (for l enter "IN" s			Iedia - Humai	n Receptor com	ıbination) - ski	p to #6
Rationa	le and Reference(s):							
Property	y is privately owned &	chances for I	najor subsu	ırface consti	uction remain	ı unlikely.		
4.	Can the <b>exposures</b> fre " <b>significant</b> " (i.e., p							

<sup>&</sup>lt;sup>3</sup> Indirect Pathway/Receptor (e.g., vegetables, fruits, crops, meat and dairy products, fish, shellfish, etc.)

<sup>&</sup>lt;sup>4</sup> If there is any question on whether the identified exposures are "significant" (i.e., potentially "unacceptable") consult a human health Risk Assessment specialist with appropriate education, training and

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greater in magnitude (intensity, frequency and/or duration) than assumed in the derivation of the acceptable "levels" (used to identify the "contamination"); or 2) the combination of exposure magnitude (perhaps even though low) and contaminant concentrations (which may be substantially above the acceptable "levels") could result in greater than acceptable risks)?

	If no (exposures can not be reasonably expected to be significant (i.e., potentially "unacceptable") for any complete exposure pathway) - skip to #6 and enter "YE" status code after explaining and/or referencing documentation justifying why the exposures (from each of the complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
	If yes (exposures could be reasonably expected to be "significant" (i.e., potentially "unacceptable") for any complete exposure pathway) - continue after providing a description (of each potentially "unacceptable" exposure pathway) and explaining and/or referencing documentation justifying why the exposures (from each of the remaining complete pathways) to "contamination" (identified in #3) are not expected to be "significant."
	If unknown (for any complete pathway) - skip to #6 and enter "IN" status code
Rationale and Re	ference(s):

5.	Can the "significant" exposures (identified in #4) be shown to be within acceptable limits?						
		If yes (all "significant" exposures have been shown to be within acceptable limits) - continue and enter "YE" after summarizing <u>and</u> referencing documentation justifying why all "significant" exposures to "contamination" are within acceptable limits (e.g., a site-specific Human Health Risk Assessment).					
	<del></del>	If no (there are current exposures that can be reasonably expected to be "unacceptable")-continue and enter "NO" status code after providing a description of each potentially "unacceptable" exposure.					
		If unknown (for any potentially "unacceptable" exposure) - continue and enter "IN" status code					
	Rationale and Re	eference(s):					

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6. Check the appropriate RCRIS status codes for the Current Human Exposures Under Control EI event code (CA725), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (and attach appropriate supporting documentation as well as a map of the facility):

<u>Y</u>	YE - Yes, "Current Human Exposures Under Control" has been verified. Based on a
	review of the information contained in this EI Determination, "Current Human
	Exposures" are expected to be "Under Control" at the _(former)Borden
	Chemicalfacility, EPA ID # 0HD 005 043 740 formerly located at 6725 Gilead St.
	Whitehouse, OH under current and reasonably expected conditions. This determination will be re-evaluated when the Agency/State becomes aware of significant changes at the facility.
	NO - "Current Human Exposures" are NOT "Under Control."
	IN - More information is needed to make a determination.

#### Note:

I supplemented the U.S. EPA's single file of available documents through a series of phone calls and informational requests. This note shall document those communications. The PA/VSI was completed on June 17, 1992. Borden's 5-acre facility became inactive in 1985, shortly after its Drum Storage Pad closure was certified-approved by the U.S. EPA (in 1984).

Although Borden had been used as a dairy between the 1930s through 1950s, between 1961 and 1982 it operated as a manufacturing center, producing lead and solvent-based printing inks. A decade ago, authors of the PA/VSI report recommended further action (i.e. groundwater sampling and analysis for VOCs) for the vicinity of an area formerly occupied by underground fuel tanks. Two underground tanks (1,000 gallons & 6,000 gallon capacities) had been removed from the location in 1991. Total Petroleum Hydrocarbons (TPH) contamination was noted, leading to excavation and offsite disposal of petroleum-contaminated (4,000 ppm) soil. Following remediation, residual TPH levels were < 20 ppm.

Borden also managed a former underground tank farm, from which chemical releases (i.e. VOCs) occurred. The 1992 PA/VSI report states "...significant levels of VOCs were detected in groundwater samples. Nothing has been done to remediate this groundwater contamination. An (8 foot thick) clay layer appears to underlie the area at a depth of about 12 feet preventing downward migration to the primary water-bearing aquifer.... Though no soil samples were taken, subsurface soil is probably contaminated because there is groundwater contamination. Surface soil should be free of contamination because the release occurred underground."

The PA/VSI also described an area contaminated with lead, from which 272 cubic yards of soils contaminated with up to 110 ppm lead were removed in 1988. Authors of the 1992 PA/VSI report concluded that groundwater should be sampled for metals and VOCs in the vicinity of the lead-contamination zone.

Because the U.S. EPA's file information ended with the 1992 PA/VSI report, it was not possible to decipher what had happened at the facility since 1992 without making a series of phone calls. But, following a chain of telephone calls, I gleaned the following. Admittedly, some of this information is rather 'sketchy.'

In late 1997, OEPA had been notified of the sale of the former Borden facility involving (or possibly sold to) a firm named Cherokee Environmental Risk Mgt., based in Englewood, CO. Cherokee performed additional sampling in 1999 to 'complete a certified closure.' Then, the property was resold, following demolition of onsite building structures (by a firm known as 'ERMC'). Evidently, following the closure-related sampling, a Feb. 15, 2000 Cherokee letter explains how there were, 'no remaining environmental issues.' Repeated phone requests to Cherokee scored no success in obtaining these documents or other information bearing on recent Borden site history. From the OEPA-NW District Office's archives, however, I was able to obtain a copy of a 7/8/98 letter from Cherokee addressed to OEPA. Therein, after summarizing results of the PA/VSI and requesting a 'no further action determination' from OEPA, Cherokee stated that "Strategic subsurface samples need to be taken in order to confirm that contaminant migration into the soils and shallow groundwater has not occurred...." A data summary report contained in the PA/VSI report shows that groundwater contaminant levels were less than MCLs in 1986.

Prior to uncovering further details on the chain of events leading to property sales, I contacted the Lucas County Recorder office, from whom I obtained the name of the current property owner for the 6725 Gilead address, which is also the former facility street address as noted on Borden's Part A application. Initially I was informed that this address is now a residential property owned by Daniel J. and Leslie A. White.

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This information was later supplemented by facts supplied through the Lucas County Auditors office, as described below. Given that the former Borden facility is evidently no longer commercially owned or operated, and is now zoned as a family residence, this would be a poor choice for a VCAA. The site no longer meets our definition of commercial facility. Presently, based on my interpretation of available records, there is little reason to suspect that hazardous constituent contamination exists in surface soils above levels of concern to human health. (This activity was reported by the signed reviewer to the file as of May16, 2002.)

In January 2005 I learned from an OEPA official that as of July 2003 a new business now occupied the site named HA International, specializing in automotive coatings. OEPA - DHWM had documentation of final closure being performed. The cleanup wasn't conducted under the State of Ohio VAP program. In late August 2005 I visited where the site should have been located; however there was no commercial street address conforming to Borden's old address as indicated on its Part A application. HA International was not observed on this street, but north of the presumed facility location there's a "B & L Automotive" which has a Logan street address bearing no apparent relation to the former Borden site. It seems as if Borden's facility may have been situated along the former railroad track line, which is now a hike/bike trail.

The former 5-acre site location is currently divided into 3 parcels (9803821 - mailing address 6711 Gilead St. a 2.8 acre parcel owned by Cocca Development corresponding to the Dollar General store and asphalt parking lot; 9803757 - a private residence situated at 6725 Gilead St. owned by Daniel White, and 9803767, another private residence situated at 6703 Gilead owned by James Fisher. While there is a local phone listing for HA International, it appears to be a business specializing in Christmas tree sales and doesn't bear any relation to the former commercial enterprise. After checking with the Village of Whitehouse (Barb Page) and the Lucas County Auditors Office & associated Engineering Dept., it does not appear as if there is any reason to pursue soil media corrective action with any owners of these parcels.

Completed by	(signature	2)	Date
	(print)	Allen Debus	
	(title)	Chemist/Project manager	
Supervisor	(signature	a)	Date
Super visor	(print)		Date
	(title)		
	(EPA Reg	gion or State)	

Locations where References may be found: 7th Floor Archive at 77 West Jackson Blvd. Chicago, IL

now "Dollar" convenience store. now divided into 3 paracls (98 no

Contact telephone and e-mail numbers

(name)	Allen Debus
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(e-mail)	debus.allen@epamail.epa.gov

FINAL NOTE: THE HUMAN EXPOSURES EI IS A QUALITATIVE SCREENING OF EXPOSURES AND THE DETERMINATIONS WITHIN THIS DOCUMENT SHOULD NOT BE USED AS THE SOLE BASIS FOR RESTRICTING THE SCOPE OF MORE DETAILED (E.G., SITE-SPECIFIC) ASSESSMENTS OF RISK.